

Summary from Swissrail's Perspective: Exchange on the Vehicle Approval Process between FOT and Swissrail Working Group on Vehicle Approval with Representatives from Industry and Operators, 27 August 2024

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Context: The Swissrail Working Group on Vehicle Approval consists of representatives from the industry and operators. The working group discussed vehicle approval processes to develop proposals on how to reduce costs and implement simplifications. These proposals were discussed during the exchange with the FOT on 27 August.

Note: The proposals were structured according to vehicle approval and ETCS-OBV approval processes.

Note on the translation: this text was translated using AI and checked by us. If you find any mistakes or something that is not clear, please let us know.

Vehicle Approval Process

Proposal: Align BBW with the 4th Railway Package

Initial Situation: There are 2000 vehicles in Switzerland: 600 operate in border areas, 800 internationally, and only 600 exclusively within Switzerland.

→ The large number of international vehicles shows that harmonization with the EU has a significant impact.

There are differences between Swiss and European terminology and practices, which pose potential for additional costs. Terms and requirements must therefore be clearly defined:

- Swiss Type Approval: Type approval in Switzerland is intended for a component, product, or vehicle as a series approval, and may be voluntarily applied for by the manufacturer (Art. 7, RailO).
- Swiss Operating Permit: Every vehicle requires an operating permit in Switzerland (Art. 8, RailO), which includes vehicle approval.
- The Swiss operating permit can also count as type approval (authorization for placing in service).
- European Type Approval: European type approval is similar but mandatory within the EU, not voluntary.
- European type and vehicle approvals are completely separate from the operation/operator/owner of the vehicles.

In general: New vehicles must obtain operating permits, and new vehicle types must obtain type approvals. The manufacturer is typically the holder of the type approval (CH) / type authorization (EU), and the operator is usually the holder of the operating permit (owner).

- In a Swiss operating permit, the holder of the operating permit is clearly defined. This is simultaneously the owner and holder of the vehicle approval. However, the holder of the type authorization is unclear.
- According to the FOT, the holder of a type approval can later be defined in the ERATV register.
- Swiss practice is not aligned with the European system.

However: Switzerland is not fully integrated into the EU; further alignment of BBW with the 4th Railway Package is not possible without further integration into ERA. Since 2019, the FOT has been making efforts to align with the 4th Railway Package while preserving pragmatic Swiss achievements. At the same time, the issue of border routes is a major focus in the European political discussion. All stakeholders aim to increase compatibility and harmonization within the possible political framework.

- In case of future uncertainties, ad hoc mutual exchanges should be conducted.

Proposal: FOT takes on an observer role and test runs are approved in coordination with the infrastructure operator

Initial Situation: Current regulations require more time and additional costs, posing a safety risk, as the applicant is responsible for assessing "changes with significant safety relevance" or "significant changes."

Article 6 of the RailO regulates the temporary operating permit for test runs. Any changes must be approved by Parliament.

- During the revision cycle of the regulations in 2028, a proposal for a change with the same level of safety can be submitted.

Can we reduce costs by promoting standardization and the targeted use of type approvals?

Initial Situation: There is a common interest between operators, FOT, and the industry in promoting type approval for vehicle components to reduce the effort for new approvals. Currently, there are very few type approvals, as requirements or designations often change in tenders and various projects.

Type approvals are rare and mostly known in the CCS area, such as for GSM-R versions or ETCS-OBU.

According to Swiss law, a type approval is explicitly valid only for the requirements known at the time of its issuance (which is not very demanding).

Idea: Swissrail encourages motivation in the industry to obtain type approvals. For example, components could be identified where type approval would offer great benefits:

- The same products with different designations across various tenders.
- Long-term standardization on vehicles would be promoted.

Additionally:

- Offer operators the opportunity to mirror the requirements in tenders with Swissrail to estimate costs.
- Long-term perspective
- In case of manufacturing changes, obsolescence (components that are no longer produced) can be reported to the FOT via email.

Elimination of duplicate assessments between DEBO NNTV and network access assessors

Initial Situation: Network access requirements are published separately by the infrastructure operator, independently from NNTV. Changes also follow their own process.

Note: The infrastructure operator must coordinate network access requirements with the FOT and only publish and enforce them through NNTV.

Objective: Eliminate duplicate procedures and simplify requirements management. Reduce duplicate assessments by better integrating network access requirements into NNTV.

ETCS-OBU Approval Process

The experiences with the safety verification concept should be used to further develop the approval process and harmonize it with ERA.

Efforts are already underway, and the FOT encourages the industry to use its channels. Future TSI adjustments should be institutionalized in the industry to optimize access to these processes.

NNTV should be addressed with the FOT, with industry participation (consultation process).

The overall goal of the industry is to reduce NNTV. The FOT can reflect the impact of NNTV with the industry through Swissrail. The industry can submit concerns during the regulatory revision cycles.

TSI additional requirements can be reflected with the industry before tenders, providing an assessment of effort and costs.

The FOT acknowledges this point and welcomes initiatives that promote dialogue between the industry and RUs.

Swissrail will initiate a dialogue with the industry and suppliers to gauge willingness to publish test titles (or further information, depending on willingness).

The FOT points to the historical background: the test sequence should not be disclosed to prevent manufacturers from preparing in advance, ensuring the quality of test results. In the past, this approach was justified, as the ESC responded to different geographical and physical conditions.

Note: It is not the number of tests that drives costs but the progression from one test campaign to the next (e.g., reversing mode).

Idea: Swissrail promotes dialogue between OBU manufacturers and infrastructure suppliers.

Outlook:

- ERA has drafted a report for the TSI on eliminating the ESC; developments in Switzerland depend on the European decision.
- The discussion shows that this topic should continue to be addressed within the industry.
- Related topics:
 - Fault monitoring could determine which tests are safety-relevant and whether the total number of tests could be reduced.
 - Swissrail will introduce this topic in discussions with the industry, and SBB will demand disclosure of test results from the industry.

Final Remarks

- This exchange was important for optimizing the overall system, though not exhaustive. There is great mutual respect.
- Swissrail offers itself as a dialogue partner for operators and the FOT to discuss future challenges.
- Swissrail proposes organizing another exchange on the topic of ETCS-OBU test titles in 6 to 9 months.