RINF 'Vision Paper'

Recommendations for the RINF stabilisation and development

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Purpose

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The Group of Representative Bodies (GRB) is a grouping of railway associations in Europe with the role of supporting, in a transverse way, the rail sector's input to the European Railway Agency (ERA) work programme and its effect on safety and interoperability. With this document some members of the GRB (CER, EIM, UNIFE, EPTTOLA, UIRR, FEDECRAIL), want to present their view on the RINF stabilisation and development.

This paper aims at proposing how the existing Register of Infrastructure (RINF) should be stabilised and completed, which are the main considerations for the future development of 'RINF 2.0'. The Paper also aims at individuating some relevant issues at the current stage of RINF.

1. Summary

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 in general 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.

It is important to avoid any redundancy with the TSIs and to optimise the infrastructure managers' efforts in providing information to railway undertakings. For this reason, a further harmonisation of the TSI requirements providing use cases to RINF (e.g. Annex D of the OPE TSI) is needed.

A sound RINF development process plan, moving towards the RINF 2.0 should be defined in a framework of compatibility with the current RINF operation stability and reliability.

More generally, the RINF 2.0 should be the register where the end-users can find (as far as reasonably possible) the infrastructure-related information that the IMs have to provide.

The switch towards a new version shall be made without any negative consequences on the existing arrangements or undue extra-costs.

As IMs have an obligation to provide data to RUs operating trains, this paper outlines the necessary approach to RINF allowing to use a specific and unique data exchange channel for each necessary item with the RUs: the RINF must be one of these channels.

2. Background

The provision of infrastructure-related information is supported by legal texts, especially Directive 2012/34, Directive 2016/797 and OPE TSI[1].

One of the main objectives of the Register of Infrastructure (RINF) is to be the common platform where IMs provide to RUs and in general to RINF End Users (e.g. manufacturers, keepers, ECMs, Combined Transport CT operators, shippers) the infrastructure-related information and geographical information, useful for the RUs and in general for the RINF End Users, to fulfil their obligations to:

- perform procedures for operating authorised vehicles;
- plan and prepare freight and passengers train operation.

It is our understanding that the use of the register of infrastructure is part of the arrangements for the use of a vehicle as outlined in **Article 23 of the Interoperability Directive**[2] and not directly part of the practical arrangements for vehicle authorisation for placing on the market.

The network statement only sets out in detail the general rules, deadlines, procedures and criteria for the charging and the capacity-allocation schemes, including such other information as is required to enable applications for infrastructure capacity (Directive 2012/34/EU).[3]

Until the RINF is complete, each Member State will keep a National Register of Infrastructure. In the case that the national infrastructure register is not complete, the infrastructure manager will provide the necessary information according to the Decision 2014/880 on common specifications of the RINF.

3. Issues at the Current Stage of RINF

The RU checks if a vehicle foreseen to be used (defined by its basic design characteristics) matches the basic parameters and characteristics of the route as part of a network by using the RINF / National Register of Infrastructure (Article 49 of Directive (EU) 2016/797).

Considering the current role of the RINF, the RUs are, at present, responsible for the route compatibility check and IMs must provide full support for the process, by providing information for the RINF according to 2014/880/EU within a reasonable period.

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1 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 (decision 2012/757 as amended by 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 and article 4.2.2.6.2 (braking performance and maximum speed allowed).

2 The reference to the use of RINF as described in Article 21(3) d IOD needs to be clarified.

3 The network statement does not have to cover technical national rules or any criteria for the route compatibility assessment nor for existing non-TSI compliant infrastructure.

The specification of the current RINF is **not sufficient** to reach the intended objective. It needs to be extended to provide the missing data by formally permitting the RINF end users to play a key role in conjunction with IMs.

As long as the overall information provided in the European Register of Infrastructure is not sufficient for the route compatibility check, the infrastructure manager shall provide this information **free of charge** and within a reasonable period of time to the requesting railway undertaking or RINF End User[4].

We believe that a bigger effort should be made on shaping the current and future change request process of the RINF, to allow the specification amendments of the current RINF being appropriate to reach the intended objectives while ensuring a high level of qualitative useable data for all RINF users

4. RINF stabilisation and completion

A sound process with a clear timeline regarding the RINF development must be defined. This process has to be compatible with the current RINF operation and needs to be kept stable and reliable.

After the development of a new **RINF 2.0** and the evidence of a possible switch without any negative consequence on the existing arrangements, a clear cut-off plan must be drafted and agreed upon between the actors.

A switch to the RINF '2.0' would require the specification and **Common User Interface CUI** being built and time for the IMs to manage data and IT arrangements to support the new process[5]. This switch would be foreseen in a one large step uploading of data and not as a multiple and sporadic sequence of limited actions, which could bring undue extra costs.

RUs, IMs and all actors involved need to plan very well in advance the timeline for every change. This process should also include the milestones for the CUI building towards the RINF 2.0. The internal timeline shall be planned after the definition of clear common targets.

Potential needs coming from potentially linked interfaces to the RINF content[6] shall be specified with single requirements. This will allow us to investigate if a broader RINF or an enrichment in content is advisable. In principle, we are **against the merging** of the RINF with other existing databases, as the sector requires a stable RINF.

Therefore, the introduction of new operational points within the RINF would be a better solution instead of merging it with others. Within this context, any harmonisation of databases and their contents should be preceded by a cost benefit analysis.

4 e.g. manufacturers, keepers, ECMs, Combined Transport CT operators, shippers
5 e.g. data collecting and XML developing between others needed IT activities
6 e.g. TEN-T database which currently present a different segmentation compared to the RINF

5. RINF and National Rules

Concerning the link between the cleaning up of the national technical rules and the RINF, the RINF shall not be used for transferring national rules[7]. We believe that all rules for technical compatibility between the vehicle and the network should be exhaustively described by TSIs and, if necessary, in case of National Rules, in the **Reference Document Database** (RDD) or the future **SRD** (Single Rules Database). Therefore, no rule shall be transferred from RDD to RINF.

In relation to the direct communication flow between the Agency and the Member States for the cleaning up of the National Rules, we ask for clarification in cases where a National Technical Rule can specify conditions that should be described in the RINF (instead of being a National Rule), see article 14(11) of IOD 2016/797.

In any case 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.) or the remaining National Rules.

Additional parameters outside the scope of 'Route Compatibility' and other intended objectives (see paragraph 2 above) should be considered only after a clear reference to the concerned legal basis.

6. 'RINF 2.0' – the future development of RINF

For an effective RINF, which allows the relevant actors to fulfil their legal obligations, we need to move towards a register that serves (as far as reasonably possible) as a unique database where RUs and in general RINF End Users find the relevant information directly, or through a service, to comply with defined use cases.

In case data, which IMs have to provide to RUs, cannot be stored in the RINF, they should be available in defined registers, referenced in the appropriate public documents (e.g. the Network Statement, etc.).

Considering the importance of the RINF in the context of the implementation of the technical pillar of the 4th Railway Package (i.e. verifications to be performed by the RUs after the vehicle authorisation to check route compatibility), we suggest strengthening the involvement of RUs. We propose to the Agency to recognise the need for an End Users Group to be held on a regular basis and not via ad hoc meetings.

The use of the RINF by the RUs, and in general by the RINF End Users, will be facilitated if the Agency interface is accessible to the RUs at the IT structure level, so that they can study how to develop the interface on the IT level.

We believe that a strong involvement of RUs is also important in the development of the future RINF, to allow a clarification on whether the information in the RINF may be adequate or not. In

[7] as introduced by the Agency in Annex I to the Program Plan Rules cleaning-up (ERA-PRG-006 V 1.0)

this respect, we ask the Agency to allow a **broader formal participation of the RINF End Users in the Agency's work stream** for the future development of RINF.

7. Conclusions

To conclude,

- the RINF should be the register where the RINF End-Users can find (as far as reasonably possible) the infrastructure-related information that the IMs must provide;
- we 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 with a proper level of data accurateness;
- until the moment the RINF fulfils the needs in terms of parameters for the assessment of the route compatibility, a transparent process must be in place within the existing regulatory framework between infrastructure managers and railway undertakings (or in general RINF End Users) in order to allow the aforesaid assessments to be conducted in a non-constraining way;
- we propose a wider involvement of RUs and RINF End Users in the development and future evolution of the RINF, and to continue working on the harmonisation of the RINF and TSIs in order to achieve full mutual support and avoid duplications;
- we support the definition of a sound RINF development process with a clear timeline. This should be made in a compatible way with the current RINF operation stability and reliability;
- after the full development of a new RINF 2.0, the switch towards the new version should be made without any negative consequences on the existing arrangements, with a clear cut-off plan agreed amid the actors;
- we strongly object to use the RINF for the cleaning up of national rules;
- we underline the importance of not transferring any rule from the RDD to the RINF.