



European Commission
DG Move – C.4
Keir Fitch
Jean-André de Motstraat 28
B-1000 Brussel

Copy
European Union Agency for Railway
Josef Doppelbauer
120 Rue Marc Lefrancq
F-59307 Valenciennes

Dr Libor Lochman
CER Executive Director

Gilles Peterhans
UIP Secretary General

Steve Wood
Chairman Heritage Operations Group
Fedecrail

Christoph Handel
Chairman NB-Rail AISBL

Tim Gilbert
EPTTOLA President

Conor Feighan
ERFA Secretary General

Philippe Citroën
UNIFE Director General

Dear Keir,

The European railway sector is going the last mile for the Union-wide implementation of the 4th Railway Package's Technical Pillar in June 2020. Major milestones have been achieved by the European institutions so far during 2020 and Member States are preparing the last steps for the transposition.

Unfortunately, a few but very important milestones have not been reached and the work on necessary documents facilitating the correct application of the Commission Regulation (EU) 2019/779 has not been accomplished; firstly, due to an overall delay in the respective work streams, and secondly, the impact of the corona virus crisis on the Agency's and sector's work. The Implementing Regulation of 16 May 2019, laying down detailed provisions on a system of certification of entities in charge of maintenance of vehicles, shall apply from 16 June 2020.

Regrettably, the Agency has not been able to achieve delivery of the following important guidance documents allowing the sector actors to prepare the application of the aforementioned regulation within the next weeks:

- ECM Application Guide
- Accreditation scheme
- Certification scheme

Furthermore, the requested clarification regarding the exchange of safety related information through the SAIT tool is still pending and the inputs from CEN TC 256/WG48 on the management of Safety Critical Components are still missing due to the current crisis.

At the moment, the European railway sector is facing great challenges due to the corona crisis and fully focusses on ensuring daily operation and the supply of essential goods to the European population.



The expected application of the ECM Regulation on 16th June 2020 without the “accompanying guidance documents” and without the possibility to carry out the necessary certification of maintenance workshops will create an unreasonable obstacle for the sector in terms of maintenance of railway vehicles, urgently needed right now.

In order to allow us to fully focus on the essential railway business of the moment, to avoid unnecessary burden and obstacles for the European railway sector, we ask the European Commission, in consultation with the Member States, to postpone the application of Commission Regulation (EU) 2019/779 to 16 June 2021 according to article 17 and all other dates in articles 15 & 16 by one year.

Yours sincerely,

Libor Lochman
CER Executive Director

Gilles Peterhans
UIP Secretary General

Steve Wood
Chairman Heritage Operations Group –
Fedecrail

Christoph Handel
Chairman NB-Rail AISBL

Tim Gilbert
President, European Passenger Train and
Traction Operating Lessors' Association

Conor Feighan
ERFA Secretary General

Philippe Citroën
UNIFE Director General