RID: 14th Session of the RID Committee of Experts’ standing working group
(Berne/hybrid, 23 May 2022)

Subject: Comments on document OTIF/RID/CE/GTP/2022/6

Transmitted by the European Union Agency for Railways (ERA)

Introduction

1. The Agency noted that there is a UIP proposal to amend TE 22 and TE 25 of RID (see document OTIF/RID/CE/GTP/2022/6) and has taken note of the UIP proposal to amend immediately RID for the future usage of Digital Automatic Central coupling (DAC) within EU Railways.

2. Considering that many other actors are directly involved in the development of the future DAC specifications, the Agency would like to follow a more secure and timely development plan of the DAC requirements, both in RID and in the TSIs/UTPs.

3. The RID amendments concerning the DAC, should fully consider the principles agreed at the establishment of the JCGE concerning vehicle-related provisions, in particular:
   - Developing high level safety objectives to be contained in RID provisions;
   - Developing Technical Specification for Interoperability (and related UTP) to be applied for fulfilling RID objectives, to be contained in the general railway legislation.

4. This approach has already been successfully applied for the development of TSI requirements for the derailment prevention and detection devices.

ERA on-going actions on the amendment of the TSI concerning the DAC (2022 revision package)

5. In accordance with the Commission Delegated Decision (EU) 2017/1474, the Topical Working Group (TWG) Freight is working on the amendment of the TSI WAG and the TSI LOC&PAS with technical requirements for a standardised DAC system for freight wagons
and freight locomotives.

6. The DAC for freight wagons and freight locomotives should at least cover the following functions:
   - Transmission of mechanical forces between freight wagons;
   - Transmission of braking energy (pneumatical);
   - Transmission of electric power to feed applications such as sensors, actuators, buffer batteries, etc.;
   - Transmission of communication such as train composition, train integrity, brake tests, etc.

7. To facilitate the transition period, a hybrid coupling system for freight locomotives will also be specified. This hybrid coupling system must be compatible with DAC and UIC manual coupling system.

8. The TSI WAG and TSI LOC&PAS shall contain requirements regarding to the mandatory retrofitting of existing freight wagons and freight locomotives with DAC (or hybrid coupling systems in case of freight locomotives). These TSIs shall contain also deadlines preventing or limiting the use of other coupling systems than DAC and provisions to facilitate the migration phase.

9. 15 TWG meetings were already organised, to which participants of the following organisations participated:
   - NSA FR, IT, FI, LU, BE and CH;
   - Representative bodies: ALE, CER, EIM, ERFA, ETF, UIRR, UIP and UNIFE;
   - Other organisations: OTIF, EU-RAIL (former S2R), EU-RAIL/EDDP and UIC, the main source of specifications related to DAC being the EU-RAIL project EDDP;
   - The European Commission;
   - An independent expert invited by the Agency

10. This Topical Working Group will continue its activities to propose an amendment to the TSI WAG, TSI LOC&PAS and TSI TAF no later than 2025.

11. A preliminary analysis shows that TE 22 and TE 25 of RID should be impacted by the work of this TWG.

12. Therefore, the Agency finds that UIP proposal is pre-matured and should not be adopted at this stage, at least to let EU-RAIL, EU-RAIL/EDDP and ERA sufficient time to develop the TSIs and to check what will be necessary for amending RID consistently.

Proposed way forward

13. With the aim of developing a legal framework satisfying all parties, ERA proposes, in collaboration with all the parties listed above, including UIP:
   - To convene a dedicated bilateral workshop with Rail and TDG experts to discuss the use of DAC in TDG context;
   - To organise the development of the RID / TSI specifications package with ERA topical working group freight and TDG experts;
   - To identify RID needs and possible amendments to draft high level safety objectives;
   - To draft a proposal for discussion at the RID Committee of Experts’ standing working group containing both (RID high-level safety objectives and TSI requirements specific to TDG services using DAC).
14. ERA proposes to consider current UIP proposal in this development framework.

**Justification**

15. UIP proposal is pre-mature and cannot take into consideration all the interfaces with the on-going TSI developments.

16. The workplan proposed by the Agency is safer, involve all the required parties, and would not compromise the delivery date of the specifications for inclusion in RID 2025.

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