

Milano, 11 October 2018

ANIE comments on ERA Draft Recommendation 006REC1078 on the revision of the technical specification for interoperability relating to “safety in railway tunnels”

ANIE Federation is the Italian Federation of Electrotechnical and Electronic Industries. We represents 1,300 companies in the electrotechnical and electronic sector with 468,000 employees and an aggregate turnover (at the end of 2017) of 78 billion euros. AICE is the trade association, within ANIE Federation, that groups together 38 companies of the Italian insulated cable, wire and accessory industry. AICE members represents about 85% of the national turnover of the sector (7,000 employees and a turnover of about 2,900 million euro in 2017).

Our Federation is deeply concerned that, if adopted, the Draft Recommendation 006REC1078 would **unduly reduce fire safety levels of electrical cables installed in railway tunnels** across Europe. ANIE strongly opposes that the suggested wording of article 4.2.1.3 (a) (3) of the Proposal listed below, for a revised technical specification included in the Draft Recommendation 006REC1078, omits the clear fire class categorization.

“Exposed cables shall have the characteristics of low flammability, low fire spread, low toxicity and low smoke density”

We call upon all relevant stakeholders to re-insert the explicit B2ca, s1a, a1 classification as the minimum requirement for exposed electrical cables installed in tunnels in the Draft Recommendation as stated in Commission Regulation (EU) No 1303/2014 so as to not lower fire safety protection measures in tunnels.

We understand that the above-mentioned article is based upon ERA Technical Opinion ERA/OPI/2018-2. Hence some of the ANIE comments will relate to specific sections of the ERA Technical Opinion.

ANIE welcomes the opportunity to participate in the open consultation on the proposal of the European Union Agency for Railways (ERA) for a revised technical specification for interoperability relating to safety in railway tunnels of the Union rail system¹.

In summary, ANIE wishes to make the following comments:

- **Commission Regulation (EU) 1303/2014 explicitly stipulates that “existing safety levels shall not be reduced in a country”. We are concerned that – if adopted – the proposed revised technical specification would clearly contradict this stipulation.**
- **ANIE believes that omitting the current clear, precise B2ca,s1a,a1 categorisation and reverting to a mere description of fire performances, would open the possibility to install cables with lower fire performance requirements than the existing fire safety requirements as set by Commission Regulation (EU) 1303/2014.**

- **In view of the volumes of cables installed per kilometre of subway and train tunnels longer than 1 km, ANIE strongly believes that a reduction of fire safety performances of exposed cables would lead to an increased fire risk for train passengers as well as onboard staff.**

The concern that the omission of clear requirements will unduly increase the fire risk is supported by the analysis provided by the Dutch Fire Service Academy as part of the Netherlands Institute for Safety (IFV) which is submitted separately in the consultation.

Furthermore, we are also convinced that the steps taken to arrive at the B2ca,s1a,a1 classification in the 2014 technical specification for interoperability relating to safety in railway tunnels of the Union rail system followed due process.

Please find a more detailed outline of our consideration in the following **technical Annex** prepared in collaboration with Europacable (European cable makers association):

Encl.: **technical Annex**

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