

ERFA Input Paper

Regulation on requirements relating to emission limits and type-approval for internal combustion engines for non-road mobile machinery

**Restrictive limits undermine a competitive rail sector's central role in a greener
transport system**

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The role of rail in achieving sustainable growth

ERFA represents newcomers on the railway market from across Europe, who play a significant role in contributing to the growth targets set for rail freight and the sustainability of the transport system as a whole.

Enabling rail freight to expand, thrive and play a central role in the greening of the EU's transport system is at the heart of the EU's White Paper goals.

It is for this reason that ERFA urges the proposals on emission standards for NRMM not to be set in a vacuum, disconnected from the realities of the conditions necessary for incentivising growth in the rail sector.

Rail freight exists in a fiercely competitive environment. Any increase to the cost of rail services is a gift to the more polluting modes, as customers are not prepared to pay the price difference.

ERFA's position

ERFA supports the European Commission proposals to improve the protection of the environment.

However ERFA would like to highlight the specific challenges in the rail sector that need to be reflected in order to avoid unintended negative consequences for the environment:

Dis-incentivising investment in rail

- There is at this moment no viable high power diesel locomotive offered on the market, which could be used for heavy haul transportation. This reflects the reality of the market for locomotive diesel engines, which is a niche one within the global market.
- In most cases, there is no known technical solution available to adapt already existing locomotives to the new stage V compliant engines. Such new engines do not fit in the limited space and weight available in the current locomotives in circulation.

Reducing the attractiveness and competitiveness of rail

- An obligation to meet stage V emission standards could result in rail freight operators being unable to invest in new locomotives to cater for growth in the rail sector, thereby undermining efforts to shift more goods onto rail.
- It risks creating stagnation in the renewal of locomotives and the modernising of fleets as the rail sector seeks to maximise use of existing engines. The life cycle of locomotives is 30 - 40 years, requiring on average 25 years for the investment amortisation

ERFA's preferred way forward:

ERFA believes it is important to continue allowing for flexibility in the replacement of engines in locomotives that have a long life cycle.

This flexibility reflects the fact that there is no known technical solution available to adapt the new emission V engines within existing locomotives and to reduce the risk that unrealistic emissions targets create perverse incentives, undermining the competitiveness and thereby growth of rail.

ERFA also urges recognition for the existing niche market for diesel engine locomotives, which means that the rail sector does not benefit from the economies of scale that e.g exist for the road vehicles industry.

ERFA therefore proposes the following changes to the European Commission proposal:

- 1) Railway undertakings should be allowed to replace engines in existing locomotives with engines of the same limit value:**

Article 57, paragraph 9 (new)

Notwithstanding Article 5(3) and Article 17(2) Member States shall permit the placing on the market of replacement engines conforming to engine types or engine families whose EU type-approval is no longer valid pursuant to point (a) of Article 29(2), provided these meet the following requirements:

(a) Engines of category RLL that comply with the emission limits that the engine to be replaced had to meet when originally placed on the Union market and at least the stage IIIA emission standard or comply with more stringent emission limits;

2) Recognition for the limited economies of scale in the diesel engine locomotive market and the higher costs this creates for the rail sector

Recital (new)

In view of the lack of a viable high power diesel locomotive, which meets emission stage V limits on the market, EU research funding should be directed towards developing diesel locomotives meeting stage V emissions standards and suitable for heavy haul transportation. The niche market for these types of locomotives undermines the market interest in developing suitable locomotives.

3) To reflect the long procurement processes for locomotives, a longer transition period should be envisaged for engines that are part of projects that are at an advanced stage of development.

Article 57, paragraph 5 (new)

5 (new) For engines of categories RLL new emission limits as set out in Tables II-7 and II.8 of Annex II shall not apply to engines that are part of a project which is, at the date of entry into force of this Regulation, at a stage of development.

Contact:

ERFA European Railway Association
Julia Lamb, Secretary General
T +32.2.672.88.47, julia.lamb@erfarail.eu