



European Rail  
Infrastructure Managers



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# EIM POSITION PAPER ON CERTIFICATION OF MAINTENANCE WORKSHOPS



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# EIM Position Paper on Certification of Maintenance Workshops

The position is based on the European Railway Agency preliminary draft of the final report of its recommendation for Certification of Maintenance Workshops (IU-CMW-final report Version 1.1)

## Introduction:

The EC Regulation 881/2004 gave a mandate to the European Railway Agency to draw up and recommend to the Commission a European system for certification of maintenance workshops for rolling stock and to make recommendations with a view to the implementation of the system in accordance with Directives 96/48/EC and 2001/16/EC both modified by Directive 2004/50/EC and 2004/49/EC.

The art 16 of the Agency Regulation 881/2004 states:

- Certification of maintenance workshops
  - Within 3 years from the start of its activities, the Agency shall develop a European system for certification of maintenance workshops for rolling stock and shall make recommendations with a view to the implementation of the system.

These recommendations shall address in particular the following items:

- Structured management system,
- Staff with the necessary competences,
- Facilities and tools,
- Technical documentation & maintenance prescriptions.

## The objectives:

The Agency has identified 3 different categories of objectives:

- economic,
- related to safety of the railway system, in particular to safety management
- those linked with the essential requirements defined in the Interoperability Directives.

EIM support the identified objectives on the basis that the application of the safety rules should cover all actors in the rail system and should aim for the best economic interest of the railway market e.g. opening up the use of cross-border maintenance workshops.

## The scope of the certification:

The certification of the maintenance workshops will cover:

- All Rolling Stock (RST) used in the European Community including museum and tourist RST, metro, tram and light rail systems.
- All levels of maintenance except the pre-departure checks and the renewal and upgrading that make necessary a new putting into service as defined in the Interoperability Directives 2001/16 and 96/48.

- All track gauges.

The scope of the report includes workshops providing maintenance for museum, light rail, metro, tramtrain and tourist systems. These systems are excluded from the Interoperability and Safety Directives only concerned with RST on the European network. The scope of Maintenance Workshops Certification should therefore exclude the above mentioned systems.

Also under this scope, the RST owned by the Infrastructure Managers should have an exceptional clearance for the certification of their own maintenance workshops. EIM understands that Infrastructure Managers who have their Safety Authorisation and Safety Management System do not need to certified their own workshops. In this context all maintenance and safety aspects are covered in their Safety Management Systems.

### Geographical Scope

EIM supports that certification should address all maintenance workshops established:

- In the EC
- Outside the EC, but which maintain RST used on the EC network.

### CMW's, Certification:

EIM supports that:

- A voluntary certification that may become a mandatory certification in middle term after an ex-post analysis. The transitional period will depend on the adaptation of the European legislation but should be limited to 3 to 5 years.
- The certificate should be recognised by all actors of the railway system in particular by the NSA. An assurance should be provided by a Memorandum of Understanding (MoU) between the member states if this recognition cannot be made mandatory by the European legislation. The Member States shall assure the promotion of the Certification in any case.
- The Agency can be mandated to perform a detailed ex-post analysis on the adoption by stakeholders and success of a voluntary certification in the railway system.
- The safety aspects concerning the use of sub-suppliers (maintenance work and component/spare part suppliers) must be stated in the safety management system for the certified workshop.
- A Common Database for the exchange of knowledge on safety critical faults to Rolling Stock is developed. A knowledge management database should be established, and a mandatory reporting to this from the certified workshop or entity in charge of maintenance.
- The maintenance workshop shall apply for a certification indicating:
  - *for components*, sub-assemblies, spare-parts: the detailed scope of activities. E.g. bogies, wheelset, brake components.

- *for the RST*: the category of vehicles and level of maintenance.

The category has to be chosen from a table. E.g High speed trains, Electric locomotives, Diesel locomotives a.s.o.

- Certification can be approved on a RST system level.
- A more specific routine and guidance for the recertification process. If a certified workshop is certified in a specific system, component or class, and will expand to other systems, components, it should be unnecessary to order a complete recertification

### **Conclusion:**

From a general point of view the Certification of the Maintenance Workshops draft covers all the safety and interoperability issues, although the economic aspects are not yet very clear. Like every other regulation this one should be also assessed for the economic and administrative impacts. A positive result of the ex-post analysis must be presented in order to move forward it a mandatory certification process.