

Brussels, 12th October 2018

To: ERA, the European Railway Agency

From: CABLEBEL, Member of EUROPACABLE

Cablebel comments on Draft Recommendation 006REC1078

Cablebel, the Association of the Belgian Cable Manufacturers, thanks the European railway Agency (ERA) for giving us the opportunity to take part in the open consultation for a revised technical specification for interoperability relating to safety in railway tunnels of the European Union rail system.

➤ **Draft 006REC1078: which consequences ?**

This Draft 006REC1078, describing a revision of the technical specification, proposes to lower the classification of the cables in term of fire performance. Therefore, the recommendation will reduce the safety requirements for exposed electrical cables in tunnels, increasing by this fact fire risks in railway tunnels.

➤ **Cablebel comments**

Regarding that Safety is an essential point of the Regulation N° 305-2011 (CPR), the present position paper expresses the opinion of Cablebel about the Draft Recommendation 006REC1078 in order to prevent the reduction of fire safety in railway tunnels across Europe: Cablebel strongly asks to preserve the class B2ca-s1a,a1 as the minimum requirement for exposed cables.

Cablebel strongly opposes that the suggested wording of article 4.2.1.3. (a) (3) (quote: “Exposed cables shall have the characteristics of low flammability, low fire spread, low toxicity and low smoke density”) of the proposal for a revised technical specification omits the clear fire class classification.

The classification B2ca-s1a,a1 must absolutely be maintained as the minimum requirement for exposed electrical cables installed in tunnels as stated in Commission Regulation (EU) No 1303/2014 so as to not lower fire safety protection measures in tunnels.

In summary:

- *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.*
- *Cablebel 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.*



Association of the Belgian Cable Manufacturers

- *In view of the volumes of cables installed per kilometre of subway and train tunnels longer than 1 km, Europacable 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.*