

#	N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
1	1	TSI INF 4.2.1 (11)	M	Banedanmark	All "points" are exchanged with "clause", except in 4.2.1 (11), 4.2.2.1 in the beginning of the text, 4.2.2.2 (5) and (7), 4.2.3.1 (1) where it is only the "point" to the TSI, there is also a point to an EN-standard, 4.2.3.1 (4) and (5). Please consider using either "point" or "clause". If using "clause", which Banedanmark finds more natural because of the different use of the words, please consider consequential corrections through the text.	A	to be discussed in the TWG editorial
2	2	TSI-INF 4.2.6.1. Track resistance to vertical loads	M	Banedanmark	Paragraph (b) and (c) refers to EN 14363:2016 point 5.3.2.3 for the definitions of maximum vertical wheel forces and maximum vertical quasi-static wheel forces, respectively. EN 14363:2016 is withdrawn and replaced with EN 14363:2016+A1:2018. Point 5.3.2.3 does not exist in the updated standard. Section 5.3.2 in EN 14363:2016+A1:2018 defines loading conditions and refers to EN 15663, but does not provide the definition of the maximum vertical quasi-static wheel forces	D/R	CR517: The remark is true but the TWG STANDARD has rejected the use of EN 14363:2016+A1:2018, as issues were detected in regards to the harmonisation of this EN. It seems that EN14363:2022 will be released on time to be included in the TSI2022 revision package. We will check this new version and try to update the TSI with the new reference, as long as no inconsistency are found. Otherwise we will maintain the reference to EN14363:2016 with reference to clause 7.5 (tbc)
3	3	TSI-INF 4.2.6.3. Lateral track resistance	M	Banedanmark	Paragraph (a) and (b) refers to EN 14363:2016 point 5.3.2.3 for the defined test conditions of maximum lateral forces and maximum quasi-static guiding forces, respectively. EN 14363:2016 is withdrawn and replaced with EN 14363:2016+A1:2018. Point 5.3.2.3 does not exist in the updated standard. Section 5.3.2 in EN 14363:2016+A1:2018 defines loading conditions and refers to EN 15663 but does not provide the definition of loading condition in relation to the lateral track resistance.	D/R	CR517: The remark is true but the TWG STANDARD has rejected the use of EN 14363:2016+A1:2018, as issues were detected in regards to the harmonisation of this EN. It seems that EN14363:2022 will be released on time to be included in the TSI2022 revision package. We will check this new version and try to update the TSI with the new reference, as long as no inconsistency are found. Otherwise we will maintain the reference to EN14363:2016 with reference to clause 7.5 (tbc)
4	4	TSI INF 4.2.7.4 (2) and (3) TSI INF 6.2.4.10	P	Banedanmark	Throughout the TSI INF, the word "structures" is replaced by "bridges". In 4.2.7.4 "structures" is used. Should it be "bridges"? In 6.2.4.10 the headline states: "Assessment procedure of existing structures" Should it be "Assessment procedure of existing bridges"? In 6.2.4.10 (1) it is stated: "Assessment of existing structures against..." Should it be "Assessment of existing bridges against..." Please consider consequential corrections through the text to clarify if "structures", if should be "bridges"	R	The clause 4.2.7.4 refers to bridges and earthworks. The Appendix E has been changed accordingly, meaning that conditions, for the different structures "types", are now described in different tables (for bridges and earthworks) respectively.
5	5	TSI INF 6.2.4.4. (3)	G	Banedanmark	The revision adds a new stage to NoBo verification of this clause – assembly before putting into service. Track layout is completely verifiable on design-stage, and there is no need to add another stage to the verification, with cost-increases for Infrastructure Managers as a result.	R	The solution provided with CR361 has been not to add an existing check but to clarify how the NoBo can do it. In the WP9 there was no consensus to delete the assessment in the Assembly stage.
6	6	TSI-INF 7.7.4.	P	Banedanmark	It is stated that: "For S-Tog services the nominal platform height of 920 mm above the running surface shall be allowed." S-tog (S-trains) are only used on the S-bahn in Copenhagen, which is a network that is functionally separate from the rest of the Union rail system and intended only for the operation of local, urban or suburban passenger services, as well as undertakings operating solely on those networks, in accordance with article 1, paragraph 2(c) of directive 2016/797, and as such outside the scope of TSI INF as well. Banedanmark proposes that 7.7.4 and 7.7.4.1 should be deleted.	D	The TSI INF reflects Specific cases in accordance to agreements between the related Member State and EC/ERA. If the legal background allows the deletion of this particular Specific case, we support the proposal. To be further discussed, in the scope of the Specific cases discussion for TSI 2022 revision package. Please note that other Specific cases are also being discussed and the discussion will continue after the recommendation issued.
7	7	TSI-INF Table 2	M	Banedanmark	In table 2 in the headline it states: Performance parameters for infrastructure for passenger traffic infrastructure <b>f</b> There is an extra f in the end, marked with red here. Has to be deleted.	A	

8	8	TSI-INF Table 2 and 3	P	Banedanmark	In both Table 2 and 3 it is stated that: “– not to be used for compatibility checks between rolling stock and infrastructure as described in clause 4.2.2.5 and Appendix D1 of the Annex to Commission Implementing Regulation (EU) 2019/773 –“  This is the same text as in 4.2.1 (5). As such, 4.2.1 (5) can be put as a reference instead of the whole text from 4.2.1. (5).	R	The repetition is needed to highlight this aspect. Experts in the TWG (TaskForce RST-INF) requested such statement for avoiding any misinterpretation.
9	9	TSI INF Appendix K	P	Banedanmark	It states that “payload according to section 2.1 subclause 4.5 of EN 15663:2017+A1:2018”  In this appendix K it uses the word subclause with reference to an EN-standard. Other references to EN-standards in the TSI INF is called points. Please consider using either "clause"/"subclause", "points" or "paragraph" when referring to an EN-standard through TSI INF.  The word "paragraph" is used in appendix T, table 49, index no. 4.	A	to be discussed in the TWG editorial
11	1	4.2.7.2	M	CER-EIM	Equivalent vertical loading for new geotechnical structures, earthworks and earth pressure effects is to be corrected as presented in the CR267 revision 16 April “CR267 _ alternative_for_WP15”	D	The CR267 draft proposal revised by the Agency will be presented for approval in WP17.
12	2	Appendix K	U	CER-EIM	As flagged by NSA ES at WP14 in March the following changes is needed in Appendix K “Mass definitions for static compatibility based upon the design mass under exceptional payload <b>according to subclause 4.5 of EN 15663:2017+A1:2018 and with regards to subclause see-section 6.4 of EN 15528:2021.</b> ”	A	
21	1	INF TSI	G	NSA CH	As FOT participates in the TSI WP (Linda Ay) there are only few additional comments in the framework of this public consultation.	NWC	
22	2	Point 2.6 (1)	G	NSA CH	We agree as long as the Swiss Permanent specific case CH-TSI-INF-001 (notified on 23rd March 2022 and possibly for adoption at the next Community/Switzerland Inland Transport Committee by the end of 2022) is not compromised.	NWC	To be further discussed, in the scope of the Specific cases discussion for TSI 2022 revision package. Please note that other Specific cases are also being discussed and the discussion will continue after the recommendation issued.
23	3	Point 4.2.6.1	M	NSA CH	The new EN 14363:2016 does not seem to have a point 5.3.2.3. Is this reference correct?	A/D	CR517: The remark is true but the TWG STANDARD has rejected the use of EN 14363:2016+A1:2018, as issues were detected in regards to the harmonisation of this EN. It seems that EN14363:2022 will be released on time to be included in the TSI2022 revision package. We will check this new version and try to update the TSI with the new reference, as long as no inconsistency are found. Otherwise we will maintain the reference to EN14363:2016 with reference to clause 7.5 (tbc)
24	4	Point 4.2.6.3	M	NSA CH	The new EN 14363:2016 does not seem to have a point 5.3.2.3. Is this reference correct?	A/D	CR517: The remark is true but the TWG STANDARD has rejected the use of EN 14363:2016+A1:2018, as issues were detected in regards to the harmonisation of this EN. It seems that EN14363:2022 will be released on time to be included in the TSI2022 revision package. We will check this new version and try to update the TSI with the new reference, as long as no inconsistency are found. Otherwise we will maintain the reference to EN14363:2016 with reference to clause 7.5 (tbc)
25	1	4.2.7.1.2(3)	M	NSA ES	The reference to Note 1 at the end of the paragraph is wrong it should be Note 34.	A	
26	2	7.7.8.2	U	NSA ES	It is unclear the use of specific cases when the requirements are more demanding than those defined in chapter 4.  It is not necessary to define requirements for speed below 160 km/h according section 4.2.3.2(2).	R	The TSI INF reflects Specific cases in accordance to agreements between the related Member State and EC/ERA.
27	3	7.7.8.3	U	NSA ES	It is unclear the use of specific cases when the requirements are more demanding than those defined in chapter 4.	R	The TSI INF reflects Specific cases in accordance to agreements between the related Member State and EC/ERA.
28	4	7.7.17.3.bis(2)	P	NSA ES	It is proposed to consider the updated EN 13715:2020.	R	UK specific cases will be removed.

29	5	Appendix K	P	NSA ES	<p>It is proposed to refer to precise sections of EN 15663:2017+A1:2018 and EN 15528:2021.</p> <p><u>Proposal:</u></p> <p>It is proposed to replace paragraph just before table 45 by the following text: <b><i>“Mass definitions for static compatibility based upon the design mass under exceptional payload according to section 4.5 of EN 15663:2017+A1:2018 with regard of point 6.4 of EN 15528:2021.”</i></b></p>	A	It has been included in the Master document INF TSI.
30	6	P.1.2	P	NSA ES	It is proposed to improve the quality of the figure.	D	To be discussed in the TWG EDITORIAL - Please provide the figure by mail to ERA WP project officers as this one can't be opened
35	1		G	NSA FR	Many standards are mentioned in the text. We understand that according to CR 526, all standards will be moved to an appendix, including the ones in footnotes.	A	
36	2		G	NSA FR	Agency should have a unique position regarding specificities for United Kingdom. All UK specific cases are removed in CCS TSI project but here, paragraphs dedicated to UK remain.	A	UK specific cases will be removed UK Northern Ireland are kept
37	3		M	NSA FR	Factor alpha should be written in an homogeneous manner in the whole document. It can be found in two forms: "alpha" or "alpha ( $\alpha$ )"	A	to be adressed to TWG Editorial
38	4	6.2.4.12	G	NSA FR	A new version of standard EN 14067-5 was released in February 2022 and may be taken into account here.	D	to be adress to TWG Standard (TBC with Valery)
39	5	6.5.1	M	NSA FR	This paragraph contains a condition valid until 2021. It should be checked if it can be removed from TSI revised text. Paragraph 6.5.3 referring to 6.5.1 may also have to be revised accordingly.	R	A change request was proposed on that point but not accepted by the WP and postponed (Discussion during the WP15 on 25 Apr 2022 didn't permit to resolve the change request. As the resolution presents no urgency, the CR is postponed to a next TSI revision). In addition, this condition may be useful to be described in the TSI, as certificates issued in such conditions before 31 May 2021 may be still valid.
40	6	7	G	NSA FR	We note that, after edition of consultation texts, CR 171 lead to further discussions and to an acceptable text. Generally speaking, it is important for the sector that implementation of TSIs is done in a sustainable manner regarding IM and Member States resources and interoperability stakes.	NWC	
41	7	7.7	M	NSA FR	The note referring to the reaching of target system in 2020 for temporary specific cases should be reviewed.	NWC	To be discussed with the EC. It is not part of ERA recommendation.
42	8	Appendix M to appendix Q	M	NSA FR	Why are some specific cases quoted in chapter 7.7 and others in Appendix M to Q? The presentation should be harmonised.	NWC	There was no request to change this presentation - specific cases in the appendixes are more detailed than in the core text and presumably should be covered by standards or removed at medium/long term. This change proposal would need to be discussed with a Working Party and cannot be introduced at this stage of the revision for the TSI package 2022. A change request can be created to initiate that discussion for a future revision
43	1	6.2.4.4	U P	NSA IE	<p>We request clarification on the point below. How does ERA propose that this requirement be satisfied?</p> <p>We request that this point be reviewed and clarity be included in the TSI as to how this should be satisfied.</p> <p>“6.2.4.4 Assessment of track layout - New “6.2.4.4 (3) At assembly before putting into service, for the review of the minimum horizontal curve the measurement values provided by the applicant or infrastructure manager shall be assessed. Rules for acceptance of works defined by the infrastructure manager shall be taken into account.”</p> <p>This change is not clearly defined enough to investigate the potential impact – i.e. ‘rules ...shall be taken into account’.</p>	R	The solution provided with CR361 has been not to add an existig check but to clarify how the NoBo can do it. In the WP9 the there was no cosensus to delete the assessment in the Assembly stage.
53	1	Section 4.2.9.3 point 2 of the Annex	P/M	Ministry (LT)	Section 4.2.9.3 point 2 sets minimum tolerance of 50 mm for platform offset when the track gauge is 1 435 mm. Minimum tolerance for platform offset when the track gauge is 1 520 mm must be set as well in clause (3) since it is technically impossible to maintain the accuracy of mm. In LT the platforms must be with heights of 200 mm or 500 mm <u>with a tolerance of +20/-10, when building or reconstructing</u> , and platform offset must be 1 920 mm or 1 745 mm <u>with a tolerance of +10/-10, when building or reconstructing</u> . We propose to amend point 2 of the section 4.2.9.3 of the Annex accordingly. Also, we would like to note, that the distances in the curves are determined separately.	D	We can discuss the amendment of point 4.2.9.3 (3) about the platform offset, because this point is specific to the 1520mm system. The point (2) is relative to the 1435mm system. Regarding the platform height, all values given in the TSI clause 4.2.9.2 are nominal values and we don't think there should be a tolerance specified for the 1520mm only.

54	2	Appendix E	P/U	Ministry (LT)	<i>In the tables of Appendix E some of the points are marked "not used". After the consultation with market participants, we think that the mark "not used" may be confusing as to whether some requirements are not applicable since the new version of the TSI enters into force, or these requirements always have been not applicable, or it means something else. We suggest clarifying the mark "not used".</i>	A	The notes in the tables of Appendix E have been cleaned up to remove the term 'not used'
55	3	Appendix S	P/U	Ministry (LT)	<i>It is not clear what is covered by the term "bridge": whether it is applicable for viaducts, culverts (especially big/wide ones), tunnels under the track, pipes, shells, etc. In some countries bridges and other aforementioned structures legally are different objects. In practice there already been cases when we were requested to explain if the requirements are applicable. Therefore, in order to avoid misapplication of TSI, we suggest setting the definition of the term "bridge" used in TSI sections 4.2.7.1, 4.2.7.4).</i>	NWC	It was agreed with the Working Party to make a reference to the definitions of EN 1997 in the application guide of the INF TSI. IN case this isn't sufficient, further clarification could be provided in the guide.
56	1	Generality	G	UTP	As the TSI was under a review process when it entered in public consultation, we chose to comment the most recent draft version of the TSI, which contains a critical evolution. Below are expressed the most significant comments on which modifications are expected. They are identified with type ""P"".	NWC	
57	2	Chapter 7	P	UTP	<p>In the frame of CR 171, the Commission advocates a general principle which is the obligation to make existing fixed installations fully compliant with "infrastructure" and "energy" TSIs when they are "upgraded". These provisions may have serious consequences for IMs.</p> <p>The additional costs resulting from this new obligation could be both considerable and unnecessary, since it generally has no effect on the ability of trains to run on the network without constraints. Concrete examples provided by France in response to the impact assessment launched by the ERA show the risk that such an obligation would pose to "upgrade" projects: either abandonment due to excessive additional costs, or the preparation of applications for derogation, which are both cumbersome and of uncertain outcome.</p> <p>This total compliance obligation has been mitigated by a certain number of detailed provisions added to Chapters 7 after the publication of the version submitted for public consultation. This occurred in recent discussions in the WP dealing with CR 171, (e.g. restrictive definition of the notion of "upgrade", exemptions from certain parameters...). However, the general principle remains; it may affect future projects in a way that has not yet been foreseen; moreover, the provisions stated above, spread out in the texts, may eventually be modified in an uncontrolled manner.</p> <p><b>Removing the obligation of full compliance from the draft text would be the most rational option.</b></p>	NWC	First of all thank you for your input. The Agency is aware about the position from the sector and has tried to bring together all the stakeholders, in order to implement the required "policy". Please take also into account that an exemption is proposed for section 4.2.9.2. Maximum lateral deviation.