

ERA Europe  
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**SUBJECT:** "Comments on Draft Recommendation 006REC1078"

Zoetermeer, 16 October 2018

Dear,

Fedet is the Dutch association of the electrical manufacturers and wholesales. Fedet section Cable represents a group of cable companies working on collective topics such as the CPR.

Fedet Section Cable would like to express its concern that the Draft Recommendation 006REC1078 if implemented would jeopardize safety in railway tunnels across Europe contradicting and opposing the activities in The Netherlands increasing safety implementing CPR by means of the Dutch standard NEN 8012 where for high fire hazard application B2ca s1d1a1 is prescribed. The mentioned Draft Recommendation conflicts with the desired safety level in The Netherlands since it aims to omit the clear fire class categorization only imposing the vaguely defined classification already in place since 2008 "Exposed cables shall have the characteristics of low flammability, low fire spread, low toxicity and low smoke density".

We call upon all relevant stakeholders not to lower fire safety protection measures in tunnels and thereby for The Netherlands introduce an undesired distinction between the safety requirements for buildings compared to tunnels and re-insert the explicit B2ca s1,a1 classification as the minimum requirement in the Draft Recommendation as stated in Commission Regulation (EU) No 1303/2014. The latter document explicitly stipulates that "existing safety levels shall not be reduced in a country". The proposed revised technical specification, if adopted, would clearly contradict this stipulation. Fedet believes that omission of the current clear, precise CPR categorization 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 which 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.

Best regards