

15. Oktober 2018
HIL

Position paper

on the consultation on the revision of the Technical Specification for Interoperability on Safety in Railway Tunnels (TSI SRT)

Dear Sir or Madam,

With this position paper, the German Cable Makers Association as part of the ZVEI - German Electrical and Electronic Manufacturers' Association wants to make a contribution to the consultation on the revision of the Technical Specification for Interoperability on Safety in Railway Tunnels (TSI SRT).

I. About the ZVEI - German Cable Makers Association

The ZVEI is committed to the common interests of the electrical industry in Germany and at the international level. Over 1600 companies have opted for membership of the ZVEI. They employ around 90 percent of the employees and staff of the electrical industry in Germany.

The ZVEI – German Cable Makers Association represents the cable manufacturer's national and international interests, whether they are economic, technological and environmental, towards politicians, standardisation bodies, transmission and distribution system operators, the industry, trade and the public.

II. Summary of the positions

- The German Cable Makers Association clearly opposes a return to the 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").

The inclusion of a defined fire class for cables gives clear instructions to the user and corresponds to the idea of a uniform European regulation regarding the classification of the fire behaviour of cables.

Therefore it is inevitable to leave a reference to a European fire class.

- Having in mind, that the wording “electric cables” includes power cables, control and communication cables and optical fibre cables, the German Cable Makers Association understands the Position of the ERA that, in very few and special cases, there might be cables that do not meet the requirements of class B2_{ca}.
- As it is essential to keep the level of safety in Europe at a consistently high level, the German Cable Makers Association therefore propose to always consider the highest possible safety standard and not to use unclear definitions, which would lead to a different level of security within Europe.
- As mentioned above, for the real majority of cable products, this corresponds to class B2_{ca} s1 d1 a1.
- For the very few products, like radiating cables, that currently cannot reach this class, the highest possible class should be selected until the technical development allows to reach the class B2_{ca} and therefore to reach the actual necessary safety level.
- With regard to the ERA opinion, we would like to point out that class D_{ca}, which is not excluded from that opinion, has no requirements for fire propagation and in this sense is contrary to the European idea of safety in the directive. This means that exceptions (in that special cases) to the B2_{ca} classification requires at least a C_{ca} classification.