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Independent Regulators' Group – Rail

IRG-Rail

IRG-RAIL STRATEGY DOCUMENT 2021-2024

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IRG-Rail is the network of independent rail Regulatory Bodies comprising 31 European countries. The overall aim of IRG-Rail is to facilitate the creation of a single, competitive, efficient and sustainable internal railways market in Europe. IRG-Rail acts as a platform for cooperation, sharing of best practices on regulatory issues and promotion of a consistent application of the European regulatory framework.

This IRG-Rail paper is published under the responsibility of IRG-Rail. The opinions expressed and arguments employed herein by member Regulatory Bodies do not necessarily reflect the official views of their respective governments.

Contents

Preamble	3
I. Strategic objectives.....	5
Objective I: Promote effective and efficient regulation applied consistently across Europe	5
Objective II: Promote a resilient, open and sustainable European railway sector.....	6
Objective III: Promote best regulatory practice for the benefit of passengers and rail freight users	7
II. Measures to reach the strategic objectives	9
a. Areas of activity and challenges ahead	9
i. Promote open and competitive markets	9
ii. Monitor the market and studying new developments.....	9
iii. Reduce entry barriers to the market.....	10
iv. Smart and sustainable mobility: the environmental challenge	10
v. Find new solutions for capacity management.....	11
vi. Promote a regulatory framework addressing new developments and challenges.....	11
1) Digitalisation.....	12
2) Looking at the whole route from doorstep to doorstep – and multimodality.....	13
vii. Address future challenges securing transparency, non-discrimination and appropriateness	14
b. Specific organisational (short- to mid-term) goals & how to improve the way we work together	15
i. Improve how we work	15
ii. Improve how we communicate.....	15
iii. Improve our status as reliable actor for the rail sector to reckon with	16
III. Conclusion	17

Preamble

1. On 9 June 2011, 15 independent national regulatory bodies for railways joined forces and of their own accord committed to meet the need for international cooperation. This need presented itself through the ever-increasing depth of the European legislative framework, and through the steadily growing internationalisation of the railways sector. The Independent Regulators' Group - Rail, IRG-Rail, is the result of those endeavours. Since its founding in 2011 it has not only grown to 31 members. IRG-Rail has also become a reliable actor within the European railway sector.
2. With this second four-year strategy the members of IRG-Rail have again set out to reflect on the challenges the transport environment in Europe holds and set their targets accordingly.
3. Since 2017, when the first IRG-Rail Strategy Document was adopted, and even more so since 2011, when IRG-Rail was founded, the railway sector has been liberalised and has seen and will see many changes both at the national and the European level, including the following.
 - Digitalization and multimodality have modified traditional market schemes, business models of transport operators and customers' behaviours, leading to significant changes.
 - The Redesign of the International Timetabling Process, TTR, has set out to improve the way capacity for train runs is awarded throughout Europe's rail network and first implementing pilots have been launched.
 - The European Green Deal, announced by the European Commission late in December 2019, the Year of Rail 2021 and other attempts to cope with the climate crisis have put a new emphasis on the need for clean and sustainable ways of transporting passengers and goods. They have moved the railway sector to the centre of attention. This has also meant that the expectations and the pressure on the railway sector to make good on its promises and the hopes entrusted upon it have risen to heights not seen before.
 - The COVID-19 pandemic has not only changed some of the ways in which IRG-Rail and the whole railway sector operate. It has also brought unprecedented, yet quick and fundamental, temporary shifts to the legislative regime guiding the market which hitherto would have seemed well-nigh impossible.¹ The pandemic has raised challenges – changes in passenger demand, disappearance of private operators, etc. but also brought to the fore the remarkable resilience of the railway sector in the light of border closures and other travel restrictions.
4. Whereas the European railway sector has undergone considerable development and change, IRG-Rail's objectives remain valid and are to promote

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R1429>

- a consistent and harmonised approach to the regulatory framework for railways by its members;
 - the development of regulatory best practice in the railway sector in Europe for the benefit of both passengers and rail freight users;
 - sustainable and effective competition in the rail passenger and freight transport market as well as a level playing field across transport modes;
 - transparency in the railway sector.
5. In addition, and as a prerequisite to the above, it always has been and remains among IRG-Rail's goals to speak at the European Union level with a unified voice representing regulatory bodies.
6. The members of IRG-Rail have come to view the ongoing and upcoming changes as an opportunity for the network and as an impetus to reflect upon its further development. Over the years IRG-Rail has built a culture of cooperation between its members based on mutual independence, professionalism and respect in the day to day dealings. The Memorandum of Cooperation, adopted by IRG-Rail's plenary in Torino on 16 November 2018, further deepens these working arrangements.

I. Strategic objectives

7. Since its creation IRG-Rail's ambitions have been set on fostering the success of the European railway sector, on increasing efficiency and consistency in regulating the railway market, and on serving the interests of its users. Promoting the implementation of a consistent and harmonised regulatory framework across the European railway network may rightly be considered IRG-Rail's first and foremost objective.
8. Developments such as the presentation of the European Green Deal and the COVID-19 pandemic have added urgency to IRG-Rail's ambitions by calling on Europe's transport sector to increase its resilience and sustainability both in ecological and economic terms. Among the different modes of transport, the railway sector seems best suited to meet these challenges and IRG-Rail is committed to step up and answer this call.
9. These ambitions require the regulatory bodies to continue to act and to adapt in light of transformations in and around the railway sector. As before, IRG-Rail members will ensure that the objectives of this strategy document are consistently reflected in the network's annual working programmes.
10. In addition, IRG-Rail seeks to help provide the sector with clear views on the key challenges to come. It is crucial, therefore, to monitor and reflect upon the European railway sector with a view to anticipate mid and long-term developments. Market players may have short/medium term plans as they need to quickly adapt to evolving market conditions and to the changing expectations of end-users. Regulatory bodies have a role in looking ahead to provide a view on the likely developments of the railway sector and on the main challenges that can be anticipated – not only at the national level but also from a European perspective, nurturing the development of the Single European Railway Area.
11. The objectives formulated in IRG-Rail's founding document, the 2011 Memorandum of Understanding², remain valid. Although progress has been made against all these objectives, further effort is required for them to be met completely.
12. On the basis of the above-mentioned objectives of IRG-Rail this document identifies the following strategic goals for the period from 2021 to 2024. It outlines the main issues for the regulatory bodies in the coming years and sets a clear strategy to meet the challenges of the railway sector lying ahead.

Objective I: Promote effective and efficient regulation applied consistently across Europe

13. IRG-Rail has always sought to promote a consistent and harmonized implementation of the European railway legislation and continues to do so in order to contribute to the development

² <https://www.irk-rail.eu/download/5/7/MemorandumofUnderstanding-withamendment.pdf>

of the Single European Railway Area. Another important part of IRG-Rail's role is to provide the European lawmakers with its members' first-hand experience of the practical application of European rules.³

14. On the other hand, IRG-Rail's work is geared toward mutual support and self-help: Exchanging knowledge and best practice in regulating with the intention of establishing a consistent approach to the European regulatory framework for railways is one of IRG-Rail's main focuses.
15. IRG-Rail is the platform aspiring to enhance the regulatory bodies' daily work by sharing practices and experiences, and building cooperation oriented toward a more consistent regulation across Europe. IRG-Rail is led by the ambition to better regulate the railway sector every day. One way to enhance the expertise of members is to make the analyses consistent with those of national competition authorities as well as other sectoral regulators. In this, IRG-Rail members may profit from cooperation with national competition authorities as well as with other sectoral regulators.⁴
16. For IRG-Rail's work to be successful, its members will continue to address regulatory issues in an open and transparent way. They remain committed to becoming more effective and efficient both internally and externally.

Objective II: Promote a resilient, open and sustainable European railway sector

17. During recent decades the rail transport sector, namely rail freight and passenger services, have undergone many substantial changes struggling to compete with road transport and aviation while adapting to new customer requirements and demands.
18. Recent developments have emphasized the importance of resilience (COVID-19 pandemic) and sustainability (climate crisis) of transport. The railway sector can make a considerable contribution to these two prerequisites by functioning effectively and, hence, successfully. To qualify as resilient, the European railway sector needs to be based on an open and competitive market. And in turn, open markets within member states must be the basis for an open European railway sector and single railway area functioning freely across borders.
19. Achieving the liberalisation of domestic rail markets in practical and not just legal terms is clearly one of the most important challenges the future holds for the sector. It will change the structure of the railway market. Regulatory bodies are tasked to contribute to removing the

³ The European Network of Rail Regulatory Bodies, ENRRB, is a useful platform which enables regulatory bodies to work on effective solutions with the European Commission. It is the main interface between regulatory bodies and the European Commission for addressing rail-related issues and European railway public policies. Other such forums of interaction include the Single European Railway Area Committee, SERAC, and the Rail Market Monitoring Scheme, RMMS, which regulating bodies can join on an exceptional basis.

⁴ In some cases, these regulators are combined with the rail regulator in one organisation.

barriers to market entry by using their regulatory tools effectively to ensure fair and transparent conditions for railway users. Only once the railway sector can reliably and swiftly react to users' needs will it be considered truly effective.

20. The opening of the European passenger rail markets to competition has had a stimulating effect. IRG-Rail has clearly expressed what should be achieved by the railway sector (e.g. the single railway market, performance and quality improvements, increased social dividend) and shown the positive impact of competition in the markets in a number of member states.
21. The progressive liberalisation of the rail market aims to facilitate the growth of rail traffic across Europe. However, although infrastructure managers and railway undertakings are used to cooperating to manage international services, cross-border issues persist, requiring coordinated regulatory action to continue. IRG-Rail is ready to play its part in overcoming these cross-border issues where they arise.
22. Reforms of the European policy framework may result in profound changes in the role and actions of regulatory bodies. Regulatory bodies will therefore have to continue and adjust regulatory tools and working methods as necessary. IRG-Rail is ideally placed to reflect on future innovations to regulatory practices in the rail sector at the European level.
23. During the COVID-19 pandemic, rail services have provided crucial transport services delivering passengers and goods alike – and, unlike other modes of transport, never ceased doing so. Trains kept running, bringing passengers and goods to their destinations in a highly reliable fashion. Trains have helped delivering essential goods both within member states and across borders, acting as the backbone of an otherwise heavily battered logistics sector and economy as a whole.
24. IRG-Rail's members are committed to regulatory cooperation across borders and to encouraging coordination and consistency of administrative processes and approaches. Cross-border issues require deep and ambitious cooperation of all involved stakeholders, as shown for example by rail freight corridors and the emerging initiatives for boosting international passenger service. Members of IRG-Rail strive therefore to continue and strengthen their cooperation and collaboration.

Objective III: Promote best regulatory practice for the benefit of passengers and rail freight users

25. Regulating the railway market is not an end in itself. Rather, applying regulatory best practice in a consumer-oriented way will serve the interest of passengers and rail freight users. This, after all, will decide the success of the railway sector. Herein lies the third strategic focus of the coming years.
26. It is crucial for IRG-Rail to break down the “technical thinking only” mindset of the railways sector to be able to induce a cultural change. So far, IRG-Rail has mainly focused on issues related to upstream markets, i.e. relations between infrastructure managers, service facility

operators and railway undertakings, as the railway environment required such crucial analyses.

27. A more user-oriented approach, taking into account quality of service, and above all passengers' welfare should be developed within the legal framework. With the opening of domestic markets to competition, it has become even more crucial for IRG-Rail to assess the benefits for end-users.
28. From a regulatory perspective this entails preparing for issues such as digitalisation of capacity allocation, open data in passenger transport and any other new approach in the future. Regulation must be swift and regulatory processes speedy to provide an innovation-friendly environment spurring innovation rather than slowing it down.
29. It will be IRG-Rail's aim over the coming years to sharpen the instrument of regulation by finding and improving ways to identify, assess and rule on new developments and innovative solutions quickly and decisively.

II. Measures to reach the strategic objectives

30. To reach these strategic goals, IRG-Rail will pursue a number of measures over the period covered by this document. Some of these measures are organisational in nature and geared toward improving the IRG-Rail network as it matures. They also include identifying new issues likely to play an important role in the future work of IRG-Rail.

a. Areas of activity and challenges ahead

i. Promote open and competitive markets

31. The following points focus on issues expected to play an even bigger role in the coming years than they have so far – and on new challenges for IRG-Rail and its members. Activities concerning complaints and ex-officio procedures on charging practices, access to infrastructure and service facilities, discrimination against certain market participants or segments to name but a few constitute routine regulatory work and will continue in the years to come. These issues are well established and ingrained in the work of railway regulators. Yet they are of no less significance and importance as they ever were.

32. With market opening now mandated by Directive 2012/34, IRG-Rail's focus has shifted towards the bigger picture. In the past its members focused mostly on how to make the infrastructure available to new entrants. IRG-Rail now needs to look more at the needs of end-users and society as a whole. The aim is to ensure effective regulation, so that competition translates into benefits for end-users.

ii. Monitor the market and studying new developments

33. Technical and regulatory developments, such as multimodality and opening to competition of national passenger markets, are deeply changing the railway sector. These trends could pose new challenges to regulatory bodies who need to deal with them to assure non-distorted competition.

34. Regulatory bodies' actions are guided by two prerequisites: Anticipating regulatory requirements as well as providing objective, data-based and experience-based analyses informing robust and effective regulation. Also, market monitoring supports benchmarking between IRG-Rail members.

35. IRG-Rail will continue to develop towards a well-informed expert forum with regular and focused exchanges of information and experience, contributing to and increasing the regulatory bodies' expertise in monitoring markets as well as their knowledge of the different European markets. The network will continue to try and deliver evidence and data-based position papers. By publishing them, IRG-Rail aims to inform the public debate and to foster a consistent application of regulatory tools across its members with a view to enhance transparency and comparability of monitoring analysis among member states.

36. IRG-Rail will strive to provide decision-makers and market players with independent views on what works and what does not work in the rail market.

iii. Reduce entry barriers to the market

37. The Single European Railway Area faces many obstacles, whether technical, legal or commercial. In general, this has a negative effect on market prices, quality of service and innovation. With this strategy, members reaffirm their commitment to help removing these barriers that limit or entirely prevent the arrival of new entrants. Market entry barriers can be strategic/artificial, or structural in nature.

38. The most common structural barriers for passenger traffic, both under public service obligations (PSO) and non-PSO, and for freight traffic include high initial cost of purchase of rolling stock, interoperability/technical barriers (rolling stock), incumbents' established transport networks with strong positive network effects, and substantial fixed costs rendering low volume entry unprofitable. The incumbents' economic advantage through knowledge of the market and undertakings is a strategic barrier. The lack of access to skilled personnel (rolling stock operations) can qualify as both, structural and/or strategic entry barrier. Finally, practices employed by existing operators, such as discriminatory access conditions, could create artificial barriers to entry.

39. Regulatory bodies in IRG-Rail will continue to identify, expose and denounce market entry barriers in their proceedings, be they ex-officio or prompted by complaints.

iv. Smart and sustainable mobility: the environmental challenge

40. On 11 December 2019, the European Commission published a Communication "The European Green Deal" stating the Commission's commitment to tackling the climate and environment-related challenges. The rail regulatory bodies in IRG-Rail welcome the intention of the European Commission to pursue a smart and sustainable mobility strategy. IRG-Rail considers that the railway sector is well placed to help meeting the challenges presented by the climate crisis promoting a reliable infrastructure and strong competitors in the railway market. Rail services are a key element of a sustainable recovery and a lasting solution to the demands of future transport in Europe.

41. To make the rail sector more competitive, it is necessary to ensure a level playing field among the different transport modes. As held by the European Green Deal, the price of transport must reflect the impact it has on the environment and on health. Whereas some of IRG-Rail's members do not have the mandate to regulate charges of other modes of transport, IRG-Rail will continue to support an open and fair market within the rail sector and across all transport modes. Thereby IRG-Rail supports that the playing field is level between the different modes of transport. By working towards the objectives set out in this document, IRG-Rail contributes to making rail an attractive alternative.

42. Multimodal transport features in the Commission's Green Deal which calls for a strong boost to increase the efficiency of the transport sector. Accordingly, a substantial part of the inland freight today carried by road should shift to rail. Railways are also important to link seaports to hinterland. This will require measures to better manage and to increase the capacity of railways.
43. Such a strong boost will need to be accompanied by adequate regulation. IRG-Rail is ready to closely monitor legislative initiatives connected to multimodal transport.
44. Although the railways have a clear competitive advantage with regards to meeting targets of decarbonisation, the rail sector seems not to have seized the opportunity this presents to improve its efficiency and competitiveness. To achieve this, the railway sector needs to become better and more competitive in a range of areas.

v. Find new solutions for capacity management

45. Much hope and resources have been invested in the success of the rail freight corridors since they were introduced in 2015 after some ten years of preparatory work and after the Regulation (EU) 913/2010 concerning a European rail network for competitive freight became effective in 2010. In the meantime, the corridor project has developed into a new approach with the Redesign of the International Timetabling Process, (TTR), that will have far reaching consequences beyond freight traffic with a proposed new system of advance capacity modelling and partitioning.
46. IRG-Rail supports the ideas of modernising the capacity allocation process; yet, the details of such a complex system need to be geared towards competition and fair access to the infrastructure for all market players, in particular where capacity is sparse. IRG-Rail and its members will continue to speak to corridor representatives, the national ministries and the European Commission. Given the importance of freight transport for the railway sector, the rail freight corridors will remain a strategic priority for IRG-Rail.

vi. Promote a regulatory framework addressing new developments and challenges

47. Regulatory bodies share the same core competencies as set out in Directive 2012/34/EU (recast). Some IRG-Rail members are also involved in additional areas. This leads to a situation where some issues fall within every regulatory body's competence, while other issues only concern some of IRG-Rail's members. Nevertheless, the members involved in additional areas to those prescribed by the Directive may wish to address them within the general framework of IRG-Rail. They have done so in the past exchanging their experience on multi-modal or multi-sector regulation with other IRG-Rail members. Subjects cover in particular:

1) Digitalisation

48. The railway sector needs to keep up with technological progress. While other modes of transport have implemented modern technologies resulting, for example, in autonomous vehicles and reusable spacecraft, the railways are still – and have been for many years – trying to solve comparatively simple problems like automatic couplings. European railways' progress continues to be hampered by national peculiarities and failure to implement Europe-wide standardisation, which could ease traffic flows across the continent. It is time for the railway sector to become interoperable and make the most of new technologies emerging across the board.
49. Already digitalisation has modified traditional market schemes, business models of transport operators and users' behaviours, leading to significant changes. The rail sector (supply chain, railway undertakings, infrastructure managers and rolling stock manufacturers) has slowly set-out on its path toward digitalisation.
50. Compared to other sectors, only limited digital solutions have been incorporated in the railway sector as yet. Centralised traffic control has become more relevant over the decades. But rail connectivity is not yet based on the newest available technologies. Projects to introduce easy to use digital tools to the process of finding and applying for suitable paths have been launched in many countries and have started to bear fruit. However, more often than not they are not yet the main tool for setting up efficient timetables. Technologies such as machine learning, should be used to make the experience better for everyone in the rail sector and attract more users. These systems need to be geared to serve a European rail market.
51. Digitalisation should not be limited to infrastructure managers or railway undertakings, but should also be directed to end users. This means having powerful internet hubs, offering accurate location information on phones and the ability to receive real-time updates. Infrastructure managers and railway undertakings need to work together to provide travelling information seamlessly integrated and suited to users' needs in reaching their destination regardless of the chosen provider or mode of transport. Agents in the railway sector need to work together to exchange the necessary timetable and real-time data under open standards to improve the end-users' travel experience.
52. Smart traffic management systems can play a crucial role. Digitalisation of capacity allocation, open data in passenger transport, through ticketing etc. are also important and will be essential to establish adequate regulation for these systems. These aspects are highly relevant to users and thus of utmost importance to the success of the railway sector in general.
53. On the infrastructure side, information on the availability of railway infrastructure and service facilities needs to be made available to railway undertakings and other applicants, so that they can reliably plan how to meet their logistic needs.
54. Some of the challenges of digitalisation needing to be addressed by the railway sector are: relatively high implementation cost of new technologies; continuous availability of data; the

risk of data monopolization; possible data security breaches; availability of skilled employees to manage new data and technology in some member states; increased complexity of daily operations; and prevailing conservatism in the industry as such.

55. The railway sector, and with it its regulators, should embrace innovation and digitalisation to ensure adequate response to the needs of users. IRG-Rail will support initiatives that promote common, European standards and digital platforms in the railway sector to ensure a level playing field across platforms and borders.
56. Digital platforms as well as the emergence of new multimodal market players should drive the regulatory bodies to develop expertise and tools to efficiently monitor the effects of these developments on both rail passenger and rail freight markets.

2) Looking at the whole route from door to door – and multimodality

57. Another important part will be played by new mobility services with the potential of reducing congestion and pollution, making (passenger) rail services more attractive.
58. In their 2017-2020 Strategy Document, IRG-Rail members identified multimodality as one of the challenges confronting regulating bodies. Since 2018, when a task force was dedicated to it, multimodality has been included as a topic in IRG-Rail annual work programmes. In the EU, a policy discourse on multimodality has developed and underpins current initiatives of the Commission promoting the integration of different transport modes.
59. With the emerging forms of communication, users' expectations are changing significantly. New technologies have created new possibilities in the access to the transport market. Passengers and freight are provided with means to challenge every mode of transport and choose the alternative best suited to their needs.
60. In the years ahead, the demand for mobility in Europe will continue to grow as users are looking to travel more safely and easily, faster and in a climate-friendly and sustainable way. These journeys do not begin at the train station: they begin and end at doorsteps. Transport services, including rail, must address effectively this necessary integration.
61. Against this background, rail regulators should ensure that the regulatory environment allows an adequate and swift reaction of all players in the rail sector, by e.g. fostering the adaptation and integration of railways with new business models such as Mobility as a Service (MaaS).
62. Digitalisation and innovation in the form of MaaS-initiatives can contribute to more accessible shared transport, and technological platforms provide means for making it easier to plan a journey combining several modes of transport and booking tickets for it – or even possible in the first place, thereby making multimodality operational and material.
63. It will be important for IRG-Rail to closely monitor and provide its view on how end-to-end solutions, including innovative ticketing solutions are reflected in European legislation. As regulators, IRG-Rail's members could play an important role in ensuring fair access to ticketing and transport information systems, for instance.

64. Thus, building on the work carried out within its task-force in earlier years (two papers were presented to the IRG-Rail Plenary, a number of case-studies have been collected and further work is under way), IRG-Rail will continue to award its resources to tackle the issue of multimodality including legislative initiatives connected to this subject, and to support multimodal transport including as it may require regulation.

vii. **Address future challenges securing transparency, non-discrimination and appropriateness**

65. With a shift towards the end-users, the initial focus on infrastructure availability needs closer examination. Infrastructure availability and its transparent, non-discriminatory and appropriate allocation is being challenged by both technical changes as well as external factors. IRG-Rail should take a stance on those other major issues of European significance in order to safeguard the regulatory benchmark of transparency, non-discrimination and appropriateness.

66. The existing railway infrastructure is limited due to high initial costs, forming high barriers to entry. Efficient allocation of the infrastructure available and coordinated planning is key when promoting the railway market. Infrastructure managers across Europe are rethinking the modes to plan necessary capacity and allocate it in a more efficient manner. With projects at European level like TTR as well as at national level, new capacity management approaches are being tested in order to improve capacity management as a whole. IRG-Rail welcomes the idea of improved capacity utilisation. However, forthcoming changes in capacity management like a shift towards more pre-constructed paths will need regulatory expertise and a close examination whether they allow for a transparent, non-discriminatory and appropriate allocation of capacity.

67. The needs of users of infrastructure should be a focus when examining long-term commitments as a means of pre-planning capacity allocation. Tools like framework agreements, available in some countries, allow for a long-term operational planning and investments. Both infrastructure managers and railway undertakings can benefit from the resulting predictability. Capacity that is allocated under long-term commitments is however unavailable for other users. The different market segments of railway transport and their differing needs due to their business model must be kept in mind when granting long term commitments. Rail freight transport needs to be able to react to short-term orders, while passenger transport tends to be more predictable and more in favour of long-term and stable capacity requests. Concepts like multi-annual rolling planning would allow for short-term capacity allocation for more than one year, although the underlying allocation model should be duly tested against the needs of the market.

68. As regulatory bodies, the members of IRG-Rail regulate the transparent, non-discriminatory and appropriate access to railway infrastructure in order to safeguard effective competition. However, competition might be distorted by factors that are not within the regulatory body's competency. State aid has a direct effect on competition, allowing the beneficiaries to be better equipped in competing for access. Unbalanced state-aid, among European states, can lead to a distortion of competition in the railway infrastructure and transport markets. IRG-Rail

should voice its concerns on such a direct effect on the railway market and should promote sustainable and effective competition on European networks.

69. Technical progress within the railway market is key to promote rail as a means of transport among end users. With improved technical equipment and the implementation of new technical standards in railway technology, it is the role of the regulatory bodies to ensure non-discriminatory access to infrastructure for all users by observing possible new barriers to entry for new entrants. Demands for technical updates in railway vehicles lead to necessary investments that users might not be able to provide. At the same time, new entrants, already facing high initial costs when entering the railway transport market, would certainly benefit from improved and efficient cross acceptance across Europe of technical assets and human resources, which come from improved and efficient harmonisation of national standards, requirements and operational rules. Accordingly, further standardisation in Europe can serve as a means to drive costs down for cross-border traffic, if it makes the use of several different national systems unnecessary.
70. Concerning the infrastructure and tasks of the regulatory body to ensure access to it, there is a need to secure supply and operation of both infrastructure and service facilities. Within an evolving railway market both infrastructure managers and service facility operators as well as railway undertakings need to adjust to the economic situation. However, within a natural monopoly and high entry costs framework, railway undertakings are dependent on the infrastructure and service facilities being made available. It is for the regulatory bodies to ensure a non-discriminatory and transparent access to the infrastructure and service facilities and consequently to monitor and enforce the legal obligation of infrastructure managers and service facility operators to provide access to their facilities and services provided therein. Coordination with railway supervisory authorities at national and European level is therefore essential and a daily challenge.

b. Specific organisational (short- to mid-term) goals & address the way we work together

i. Strengthen the way we work

71. IRG-Rail is extremely valuable to its members as it allows them to identify arising regulatory issues by sharing national cases and national practices, and to inform EU policy proposals. It has proven to be a useful tool that can provide members with innovative solutions to regulatory challenges.
72. IRG-Rail's working groups and the system whereby most of the network's day to day activity revolves around them have been effective. IRG-Rail will continue to look at ways to further increase participation in the working groups.

ii. Strengthen the way we communicate

73. The members of IRG-Rail are committed to further improve IRG-Rail communication within the organisation and with the railway sector to further increase transparency.

74. Among IRG-Rail's most valuable resources are the tried and tested channels of engaging with legislators in the member states and at European level. The firm links of communication and exchange with these decision makers enable IRG-Rail to advocate its positions and inform the policies relevant to the regulators' work and the railway sector as a whole.
75. Many of IRG-Rail's goals as outlined above, but also many of the expectations by others, can only be met by communicating, being heard and understood by all relevant agents in the European railway sector. IRG-Rail will continue its dedication to communicating with one voice in a clear, concise and timely fashion, especially at the European level.
76. Speaking with a strong voice has never been an end in itself. In fact, it may be understood as a prerequisite for successfully engaging with the various stakeholders in the European railway sector, which is another one of IRG-Rail's goals.

iii. Strengthen our status as reliable actor for the rail sector to reckon with

77. Over the past years IRG-Rail has met one of its goals set out in the 2011 Memorandum of Understanding, its founding document, which calls for "an open dialogue with all relevant parties". IRG-Rail remains committed to the second part of this goal, which calls to "ensure that its views and activities are presented in a transparent manner".
78. During the first ten years of its existence IRG-Rail has built a host of networks as a group but also – and of equal importance – through each of its members individually. These play an important role in staying informed and keeping abreast of developments within the railway sector.
79. The meetings the rotating chair conducts regularly with representatives of the sector's leading stakeholders are a valuable instrument to IRG-Rail's networking efforts. They help ensuring that what may be called the 'regulatory angle' is actively pursued and brought forward in any considerations of developments in the European railways sector.

III. Conclusion

80. IRG-Rail is committed to be an effective, high performing network responding to the evolution of the regulatory landscape and help the rail sector to meet its challenges and opportunities. IRG-Rail will continue to look at how to improve cooperation among its members and how it communicates with other stakeholders to ensure effective, proportionate regulation in the interests of users. IRG-Rail will continue to seek to achieve synergies and sharing best practice with other regulators, industry players and with European institutions and organisations. It will continue to be a communicative and transparent organisation, focused on consulting, informing and listening to many and varied audiences. It will focus on being data-driven, evidence-based, and on reporting publicly on its findings.
81. Regulatory bodies need to continue developing common approaches to and a common understanding of the European legal framework and its application to support the development of the European internal market. Therefore, IRG-Rail will continue to focus on enhancing the cooperation between its members as well as developing regulatory best practice. IRG-Rail will also share the experiences of its members with the stakeholders of Europe's railway sector. IRG-Rail's members will continue to work guided by a strategy adjusted to major developments in the sector, increased attention to the needs and desires of end-users, and the evolving role of regulation in a fast-changing sector driven by digitalization.