

# POSITION PAPER

**Commission proposal 2013/0297 (COD) amending Regulation EC 91/2003 of 16 December 2002 on rail transport statistics as regards the collection of data on goods, passenger, and accidents**

November 2013

COMMUNITY OF EUROPEAN RAILWAY AND INFRASTRUCTURE COMPANIES - COMMUNAUTÉ EUROPÉENNE DU RAIL ET DES COMPAGNIES D'INFRASTRUCTURE - GEMEINSCHAFT DER EUROPÄISCHEN BAHNEN UND INFRASTRUKTURGESELLSCHAFTEN



## Introduction

The European Commission published on 30 August 2013 a proposal amending Regulation 91/2003 of the European Parliament and of the Council on rail transport statistics. The purpose of this proposal is to modify the existing rail transport regulation, with the aim of updating, simplifying and optimising the existing legal framework.

CER believes that rail transport statistics are important and necessary, as they allow the Commission to monitor rail transport developments, and consequently to propose new legislation or adapt existing ones. The quality and timeliness of such statistics, as well as the identification of the appropriate variables to be collected, are therefore a precondition for good policy making. Eurostat statistics in particular are indispensable, as they are the only official source of reliable transport statistics at member state level.

CER and its members are, simultaneously, providers as well as users of rail transport statistics. In this capacity, CER strongly welcomes the Commission proposal to update, simplify and optimise the existing requirements for rail transport data provision. However, the current proposal is likely to lead to some loss of data quality. CER believes that this quality loss must be carefully monitored to ensure that the trade-off between the needs of data users and the burden of data providers is kept in balance.

## **1. REMOVAL OF SIMPLIFIED REPORTING: DELETION OF ANNEXES B, D AND I, AND NEW ANNEX L**

CER welcomes the Commission proposal to delete Annexes B and D (simplified reporting on the transport of goods and passengers) and Annex I (currently used for verifying coverage between detailed and simplified reporting), while at the same time lowering the thresholds for detailed reporting of goods (from 500 million tonne-km to 200 million tonne-km) and passengers (from 200 million passenger-km to 100 million passenger-km). This will ease the data reporting burden of the smallest railway undertakings and national statistical institutes, and at the same time capture more railway undertakings under the detailed reporting.

CER understands that under the new proposal, there will be no data loss of the aggregated totals (tonne-km, tonnes, passenger-km, passenger, train-km) because Annex L (new) requests member states to provide aggregated freight and passenger data for railway undertakings falling below the newly proposed thresholds. This is particularly important in the context of modal share calculations, as a loss in the aggregated rail totals would lead to a loss in the rail market share with respect to other transport modes. CER is pleased that the new Commission proposal ensures that no rail data will be lost at the aggregate level.

However, the proposal to delete the simplified reporting will lead to at least some loss in data quality. CER feels that in exchange for lowering the burden on data providers, a small loss in data quality is certainly acceptable. CER would nonetheless urge the Commission to review this data loss on a regular basis, and to report the results to the European Parliament, the Council, national statistical institutes and other stakeholders, such as the rail sector, in a timely fashion. It must be ensured that as the rail market continues to develop, the trade-off between lowering the burden on data providers and the loss of data quality remains in good balance.

## **2. IMPROVEMENTS TO PASSENGER DATA: CHANGES TO ANNEX C**

In order to simplify the collection of rail passenger statistics, and to make rail passenger data become available sooner, the Commission proposes to delete Tables C1 and C2 on provisional passenger data, and to shorten the deadline for providing the final passenger data from fourteen to eight months after the end of the reference period. CER strongly supports this proposal as it will mean that rail passenger data will become available sooner. This is especially important at a time when the regional passenger market is being liberalised and expected to undergo rapid change.

### **3. REMOVAL OF ACCIDENT STATISTICS: DELETION OF ANNEX H**

Rail accident data is presently collected by the current rail statistics regulation as well as by ERA under the Statistical Annex to Directive 2009/149 on railway safety. This dual collection is inefficient not only because it requires duplication of labour but also because the two datasets are not identical, thereby creating data conflicts and, as a consequence, a reduction in the overall data quality. CER therefore welcomes the Commission proposal to delete Annex H on rail accident data from the rail statistics regulation and thereby avoid duplication of labour.

CER shares the view of the Commission that statistics on railway accidents should in the future be collected only by ERA. However, in order to ensure comparability of accident data with other transport modes, CER believes a close cooperation between Eurostat and ERA on accident data is indispensable, especially with respect to data qualifications.

### **4. MISSING DISTANCE-BASED RAIL STATISTICS - ANNEX F**

The market share of rail over specific distance classes is an important point on the current EU transport agenda. The 2011 Transport White Paper puts forward ambitious long-term targets for the rail sector, many of which are based on distance classes. For freight transport, the aim is to shift 30% of road freight over 300 kilometres to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050.

CER is therefore surprised that a proposal which intends to update and modernise the current rail statistics regulation, with the aim of aligning it to the data requirements of the current EU transport policy, would overlook this important aspect.

The rail sector, most notably the CER and UIC, have been asking for distance based rail freight modal shares since decades. Rail distance-based modal shares are not only important in the context of the 2011 White paper, but are a necessary tool for monitoring over time the development of the rail freight sector on the relevant market in which it operates (i.e. excluding the door-to-door market segment serviced largely by the road sector).

“Intercity” rail freight statistics are the normal standard for measuring and monitoring developments of the rail freight market in the United States. Although conventional rail freight statistics (i.e. as equivalent to the annual tonne-km data disseminated by Eurostat) are not commonly available in the United States, the American Association of State Highway and Transportation Officials (AASHTO) published some years ago the results of a study which shows that in 2000 the US rail freight modal share was 28% in terms of conventional ton-miles and 40% in terms of intercity ton-miles.

Similarly, in 2007 the UIC carried out a pilot test on the medium-to-long distance (i.e. “intercity”) rail-road freight market share for six railway companies representing approximately 20% of the total European rail

freight market. The results show an increase in rail freight market share (measured in tonne-kilometres) from 19% on the conventional “total” market to 30% on the market segment of over 500 km.

Since policy makers will look at modal share developments when assessing the performance of a mode, and might even base key decisions, such as the allocation of infrastructure financing, on these observations, CER feels that it is crucial for Eurostat to publish official distance-based rail freight statistics (as well as comparable distance classes for the other transport modes). One way of producing such a distance breakdown would be to use the regional data provided under Annex F of the rail statistics regulation. CER therefore proposes to amend Annex F by including tonne-km as an additional variable, and increasing the frequency of the data collection from “every five years” to “every year”.

#### **4. LINK TO RMMS REPORTING OBLIGATIONS**

In the context of the RMMS implementation act as foreseen under Article 15 of Directive 2012/34 (RMMS Reporting obligations), the European Commission is currently in the process of identifying detailed statistical obligations on member states, and indirectly on CER members as data providers, which go far beyond what is reasonably necessary for monitoring the use of the network and the evolution of framework conditions.

The current status of the working document prepared by DG MOVE contains detailed data obligations on infrastructure charging, capacity allocation, infrastructure investments, price developments, quality of rail transport, public service obligations, licensing, the degree of market opening, interoperability and rail employment.

While CER has always been supportive of the RMMS data collection, CER feels that the level of detail requested under the current draft working document is unbalanced with respect to the administrative burden it imposes on data providers. Especially in the context of simplifying and optimising the current rail statistics regulation, CER feels that the proposed RMMS obligations are in stark contradiction to this approach. CER would welcome a closer cooperation between DG MOVE and Eurostat on this issue, especially with respect to exchanging experiences on data definition, management and quality controls.

## Disclaimer

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