



campaigning
by the
Railway Development
Society Limited

International Group

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Dear Chris,

Channel Tunnel: Transposition of Railway Safety and Interoperability Directives

Thank you for providing an opportunity for Railfuture to respond to this consultation. We support the transposition of these directives because we are in favour of a wider variety of rolling stock being able to use the Channel Tunnel. This will enable a greater number of passenger train services to operate to a wider variety of destinations and will therefore enable the tunnel to realise more of its potential for environmentally friendly travel.

Our answers to the individual questions in the Consultation document are as follows:

Question 1: Yes we agree with these revised definitions in chapter 1 and the rationale for introducing them.

Question 2: Yes we agree with the changes to the duties and responsibilities outlined in chapter 2.

Question 3: Yes we agree with the changes to safety management and certification in chapter 3.

Question 4: Yes we agree to the amendments to staff training in chapter 4.

Question 5: Yes we agree with the proposed amendments to the rolling stock provisions in chapter 5. This should make it easier to authorise the use of additional types of rolling stock to operate both through the Channel Tunnel and within the UK beyond the tunnel.

Question 6: Yes we agree that a reference to Annex 1 of the Railway Safety Directive is more appropriate in this case.

Question 7: We are not qualified to assess whether the costs and benefits in the Impact Assessment are correct.

We would also make an additional observation. The basic principal reason for these changes to the Railway Safety and Interoperability Directives is clearly to allow other than existing train types to operate through the Channel Tunnel safely, and to bring the Tunnel's safety requirements in line with those for similar long international tunnels, elsewhere in Europe.

Presumably the proposed changes will ensure that the highest levels of tunnel and train safety will then have been achieved? Therefore we believe that there can no longer be any justification by the UK Government to require personal security scans of passengers' bodies and their luggage, similar to those boarding aircraft, before boarding Eurostar trains or any future trains for tunnel services not yet built, if the reasons for this are the alleged risk of damage to trains or the tunnel infrastructure by terrorists or other criminals, through items carried on their person or in their luggage.

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This is especially relevant; as to date there have been nil reports of such intended acts by passengers on these services, nor anywhere else travelling on similar services in Europe. Indeed such attacks by passengers have been entirely carried out on metropolitan services, and to our knowledge, no security checks on intending passengers are currently undertaken on passengers entering the urban metro systems that have suffered these attacks, (i.e. London, Paris, Madrid, Tokyo). We believe therefore that there can be no continuing valid reasons for these security checks on international passenger train services to be maintained, which effectively prevent the carriage of domestic and international passengers on the same services on a widespread basis, and severely inhibit the potential extension of international services beyond the existing three capitals served (apart from a handful of weekly season services from London to Avignon and the French Alps and return).

We urge the UK and other relevant Governments to consider the modification or abolition of these security checks accordingly.

Yours sincerely,

A Macfarlane

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