



# Position Paper on the European Commission's proposal for a Regulation on Alternative Fuels Infrastructures (AFIR)

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# About UNIFE

Operating in Brussels since 1992, UNIFE represents European train builders and rail suppliers. The association advocates on behalf of more than 100 of Europe's leading rail supply companies – from SMEs to major industrial champions – active in the design, manufacture, maintenance and refurbishment of rail transport systems, subsystems, and related equipment. UNIFE also brings together national rail industry associations from 11 European countries. Our members account for 84% of the European, and 46% of the global, market for rail equipment and services. We communicate members' interests at the European and international levels while actively promoting rail equipment and standards worldwide.

UNIFE strives to effectively represent its members' interests at both the European and international levels. Our mission is to proactively foster an environment within which members can continue to provide high-quality railway systems needed to meet the growing demand for rail transport – both passenger or freight services – in Europe and beyond. UNIFE is committed to maintaining the strong performance and technological leadership of Europe's rail supply industry. It continuously works to raise political and public awareness about the economic, environmental, and societal benefits of rail transport. This is why we are promoting rail market growth for sustainable mobility!

## Executive Summary

UNIFE – the association of the European rail manufacturing industry – has set the European Commission's proposal for a Regulation "on the deployment of alternative fuels infrastructure" (*hereinafter: AFIR*) as one of its main priorities in the framework of the Fit-for-55 Package.

European rail manufacturers are fully committed to foster the deployment of alternative fuels infrastructure in Europe, in order to minimise its dependence on oil, diversify and secure its energy supply as well as drastically mitigate the environmental impact of transport including for rail.

Clean technologies and alternative fuels represent one of the fastest growing markets in Europe, led by technological innovation. A repeal of the former AFI Directive and the proposal of an updated Regulation – in full compliance and consistency with the European Green Deal and its climate-neutrality ambition is, therefore, necessary.

The role of electrification and green propulsion systems – such as hydrogen fuels-cells and battery powered trains – assume tremendous significance. The proposed AFIR should set the regulatory framework which enables rail to harness the potential of clean technologies and alternative fuels.

By 2050, if the TEN-T rail network is completed and fully electrified, 70.000km<sup>1</sup> of lines in the EU will remain not electrified, without counting private railway networks (industrial networks, some shunting yards and harbors). In terms of rolling stock, it is estimated that around 6 000 diesel trains and as many diesel locomotives are in service today. This is why we believe that the proposed AFIR offers an opportunity to address the decarbonisation of the EU rail network.

With the present Position Paper, UNIFE aims to provide a thorough analysis of the Commission's AFIR proposal, expressing our members' views and stance, as well as suggestions for improving the text.

Rail is the greenest mode of mass transportation, having cut steadily its greenhouse gases (GHG) emissions and improved its energy efficiency. The ambition of reaching net-zero emissions, even ahead of the Green Deal's mid-century horizon, is within reach for the sector. The AFIR is an essential instrument to enable rail to lead the green transformation in the EU.

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<sup>1</sup> Calculation based on EU Statistical Pocketbook *EU Transport in figures 2019*.

- EU-27 rail network includes about 217.000km of main line, 54% being electrified today, i.e 117.000km.
- 95.000km of electrified lines are on the TEN-T (2015) and 22.000km on the non-TEN-T network.
- By 2050, 147.000km of lines in the EU (out of which 125 000 Km on the TEN-T and 22.000 Km on the non-TEN-T) will be electrified. 70.000km of lines will remain not electrified, compared with 100.000km today.

## Scope – The role of Rail

The former AFI Directive covered alternative fuels infrastructures only for road transport and shipping. Rail transport was therefore excluded from the AFID’s scope.

UNIFE had repeatedly called the European Commission to include rail transport within the scope of the revision proposal.

### AFI Regulation proposal

- Rail is contemplated in the scope of the AFIR proposal. All modes of transport are now addressed by the new proposed instrument.
- Electrification remains the main tool to drive rail transport towards net-zero emissions. The deployment of alternative fuels infrastructures for rail is bound to the specific condition that the infrastructure at stake cannot/will not be electrified.
- National Policy Frameworks (NPFs) by Member States would also include information about rail. They must specify domestic targets and measures to foster the roll-out of alternative fuels on specific segments of rail network which would not be electrified.

<p><u>Recital (40)</u>  <i>In order to promote alternative fuels and develop the relevant infrastructure, the national policy frameworks should consist of detailed strategies to promote alternative fuels in sectors that are difficult to decarbonise such as aviation, maritime transport, inland waterway transport as well as rail transport on network segments that cannot be electrified.</i>  <i>[...]</i>  <i>Long term decarbonisation strategies should also be developed for TEN-T ports and TEN-T airports, in particular with a focus on the deployment of infrastructure for low and zero emission vessels and aircraft as well as for railway lines that are not going to be electrified [...]</i></p>	<p><u>Recital (11)</u>  <i>Implementation in Member States should ensure that a sufficient number of publicly accessible recharging points is installed, in particular at public transport stations, such as port passenger terminals, airports or railway stations [...]</i></p>	<p><u>Art. 13 (1) (c) (p) – National Policy Frameworks</u>  <i>By 1 January 2024, each Member State shall prepare and send to the Commission a draft national policy framework for the development of the market as regards alternative fuels in the transport sector and the deployment of the relevant infrastructure.</i>  <i>That national policy framework shall contain at least the following elements:</i>  <i>[...]</i>  <i>(c) national targets and objectives for the deployment of alternative fuels infrastructure related to points [...] (p) of this paragraph for which no mandatory targets are set out in this Regulation;</i>  <i>[...]</i>  <i>(p) a deployment plan including targets, key milestones and financing needed, for hydrogen or battery electric trains on network segments that will not be electrified.</i></p>
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### UNIFE’s assessment

- UNIFE **welcomes** the inclusion of rail within the framework of the new Regulation. Electrification remains the priority to fully decarbonise rail transport but there is the acknowledgment of the potential of other green propulsion systems for rail.
- UNIFE **welcomes** the explicit reference to hydrogen and battery electric trains within a domestic NPF’s deployment plan.
- UNIFE **welcomes** the consistency between a deployment plan for the roll-out of alternative fuels infrastructures in rail with the eligibility of hydrogen refuelling infrastructures for rail under the Connecting Europe Facility 2 (CEF2) Work Programme<sup>2</sup>.
- UNIFE **requests** that mandatory targets for the deployment of alternative fuels infrastructures in rail are established, provided that they are adapted and updated according to the national decarbonisation strategies, in conjunction with the development of the technology. National mandatory targets related to

<sup>2</sup> Annex to the Commission’s Implementing Decision “on the financing of the Connecting Europe Facility”; Transport sector and the adoption of the work programme for 2021-2027; 6.2.2. Actions related to sustainable and multimodal mobility – Alternative fuels infrastructure.

those parts of the EU rail network which are not to be electrified would strengthen rail's decarbonisation strategy and ambition.

- UNIFE **requests** that rail is addressed in the "Technical Specification" of Annex II as it is the case for road and maritime transport. Infrastructure standards shall be developed in accordance with the existing and ongoing development of railways related standards.
- UNIFE **welcomes** the recognition of the role of railway stations as key infrastructures to enable multimodal electromobility. However, UNIFE **requests** that the same provision is foreseen for the installation, at railway stations, of hydrogen storage facilities coupled with standardised refuelling interface.

## Definition of Alternative Fuels

The former AFI Directive gave a definition of "alternative fuels" which, beyond electricity and hydrogen, was including: biofuels; synthetic and paraffinic fuels; natural gas in gaseous form (compressed natural gas CNG) and liquefied form (liquefied natural gas (LNG); and liquefied petroleum gas (LPG).

UNIFE had requested the European Commission to revise the typologies of alternative fuels included in the Directive, prioritising electricity, hydrogen and batteries. Therefore, the legal framework should focus only on those fuels which enable zero direct emission transport.

### AFI Regulation proposal

- The definition of alternative fuels is enlarged and divided into three categories: 1) 'alternative fuels for zero-emission vehicles; 2) renewable fuels; and 3) alternative fossil fuels for a transitional phase.
- CNG, LNG and LPG are still included within the definition of "alternative fuels", falling within the 3<sup>rd</sup> category, and their role is emphasised notably for what concerns maritime transport and road transport for heavy-duty vehicles (HDV).
- Notably, mandatory targets are set for Member States to deploy LNG infrastructure along the TEN-T core network for road transport and in key maritime ports.

#### Art. 2(3) – Definitions

3) "alternative fuels" means fuels or power sources which serve, at least partly, as a substitute for fossil oil sources in the energy supply to transport and which have the potential to contribute to its decarbonisation and enhance the environmental performance of the transport sector, including:

a) alternative fuels for zero-emission vehicles':

- electricity,
- hydrogen,
- ammonia,

b) renewable fuels:

- biomass fuels and biofuels as defined in Article 2, points (27) and (33) of Directive (EU) 2018/2001,
- synthetic and paraffinic fuels, including ammonia, produced from renewable energy,

c) alternative fossil fuels for a transitional phase:

- natural gas, in gaseous form (compressed natural gas (CNG)) and liquefied form (liquefied natural gas (LNG)),
- liquefied petroleum gas (LPG),
- synthetic and paraffinic fuels produced from non-renewable energy;

### UNIFE's assessment

- UNIFE **questions** the permanence of fossil products such as CNG, LNG and LPG within the definition of "alternative fuels" – due to their high GHG footprint from extraction, storage, distribution and burning<sup>3</sup> – notably the targets for Member States on LNG infrastructure bear a high risk of stranded assets after 2050. The definition seems to go against the potential deployment of electrification, hydrogen, and ammonia in the transport sector. A clarification on the duration of the transitional phase would be necessary.
- UNIFE **calls** the European Commission, the European Parliament, and the Council to reconsider the definition on "alternative fuels" and make it more coherent with the ambition of zero-emission transport.

<sup>3</sup> (-> <https://www.science.org/doi/10.1126/sciadv.aaz5120>)

Fossil fuels in its various forms (i.e., LNG, LPG, and hydrogen produced through non-renewable sources) do not qualify for the decarbonisation of the transport sector and should therefore not be considered in the frame of the new Regulation.

## National Policy Frameworks (NPFs)

The former AFI Directive was mandating Member States to prepare National Policy Frameworks (NPFs) for the development of the market as regards alternative fuels in the transport sector and the deployment of the relevant infrastructure.

No mandatory targets at EU-level or at national level in the NPFs were established for the roll-out of alternative fuels infrastructures.

A reporting mechanism, from the Member States to the Commission, was set up regarding the NPFs implementation

UNIFE had stressed on the importance of stronger and more harmonised requirements for NPFs implementation by Member States. Provisions in the former AFID appeared not to be prescriptive enough to ensure a consistent implementation of the Directive and avoid diverging application by Member States.

UNIFE had also called for more coordination between NPFs to be fostered by strengthening the cooperation framework among Member States as well as the monitoring and reporting by the European Commission.

### AFI Regulation proposal

- The proposed AFI Regulation still mandates Member States to establish National Policy Frameworks but, at Article 13, it enlarges considerably the number of elements to be included in the NPFs.
- The level of scrutiny on domestic strategies for alternative fuels is considerably strengthened. Member States have now to submit first a draft version of their NPF to the public and the Commission, with the latter having the power of assessment and formulation of recommendations.
- The cooperation tools among Member States remain centred around consultations or joint policy framework, with the addition of establishing a specific sector-based coordination for waterborne transport.

<p><u>Art. 13 (4) (6) (7) (9) – National Policy Frameworks</u>  <i>By 1 January 2024, each Member State shall prepare and send to the Commission a draft national policy framework for the development of the market as regards alternative fuels in the transport sector and the deployment of the relevant infrastructure.</i>          [...]  <i>4) Where necessary, Member States shall cooperate, by means of consultations or joint policy frameworks, to ensure that the measures required to achieve the objectives of this Regulation are coherent and coordinated. In particular, Member States shall cooperate on the strategies to use alternative fuels and deployment of corresponding infrastructure in waterborne transport. The Commission shall assist the Member States in the cooperation process;</i>          [...]  <i>6) Each Member State shall make available to the public its draft national policy framework and shall ensure that the public is given early and effective opportunities to participate in the preparation of the draft national policy framework;</i>  <i>7) The Commission shall assess the draft national policy frameworks and may issue recommendations to a Member State no later than six months after the submission of the draft national policy frameworks;</i>          [...]  <i>9) By 1 January 2025, each Member State shall notify to the Commission its final national policy framework.</i></p>	<p><u>Art. 14 (1) (5) – Reporting</u>  <i>1) Each Member State shall submit to the Commission a standalone progress report on the implementation of its national policy framework for the first time by 1 January 2027 and every two years thereafter;</i>          [...]  <i>5) The Commission shall adopt guidance and templates concerning the content, structure and format of the national policy frameworks and the content of the national progress reports to be submitted by the Member States in accordance with Article 13(1) and six months after the date referred to in Article 24. The Commission may adopt guidance and templates to facilitate the effective application across the Union of any other provisions of this Regulation.</i></p>
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## UNIFE’s assessment

- UNIFE **welcomes** the higher level of prescription in domestic NPFs. This is expected to provide better alignment between the different national strategies – avoiding scattered implementation across Member States as it was the case for the former AFID.
- UNIFE **welcomes** that the opportunity, for the European Commission, to comment upfront on the draft NPFs providing an additional layer of security against strategic fragmentation. Moreover, the fact that draft NPFs would be released publicly may increase the level of transparency.
- UNIFE **welcomes** the mandate for the Commission to harmonise the content, structure and format of the national policy frameworks as well as of the national progress reports. This should increase the consistency, as much as the comparability, of Member States’ deployment plans regarding alternative fuels infrastructures.
- UNIFE **calls** for the extension of such mandate, for the European Commission, to the effective application of any other provisions of this Regulation proposal.

## Trans-European Transport Networks (TEN-T)

The former Directive highlighted the synergy between the roll-out of alternative fuels infrastructures and the TEN-T. In particular, the Directive prescribed electricity recharging stations, as well as refuelling points for both LNG and CNG, to be coordinated with the implementation of the TEN-T Core Network.

Yet, due to the low(er)-scale of maturity of the hydrogen technology, no link between hydrogen refuelling stations and TEN-T was provided.

UNIFE had pointed out the need for a stronger alignment between the TEN-T Networks and the deployment of alternative fuels infrastructures in the EU.

Finally, UNIFE had stressed that, even if by 2050 the TEN-T network is completed and fully electrified, 70.000km of lines in the EU will remain not electrified. Therefore, there is a need to address the non-TEN-T part of the infrastructure to enable rail to reach net-zero emissions along the whole EU rail network.

## AFI Regulation proposal

- The draft AFI Regulation establishes specific mandatory targets for Member States in order for domestic public authorities to roll-out alternative fuels infrastructures along the TEN-T Core and Comprehensive Networks.
- Along the TEN-T Core and Comprehensive Networks, Member States will have ensure minimum coverage of publicly accessible recharging points and hydrogen refuelling points dedicated to light- and heavy-duty road vehicles – as well as appropriate number of LNG refuelling points in maritime TEN-T Core Network’s ports and minimum provisions for electricity supply to all stationary aircraft.
- The AFI Regulation proposal does not set any requirements related to the installation of hydrogen refuelling points for rail along the TEN-T Networks, nor it address the non-TEN-T parts of the rail network.

<u>Art. 3(2) (a) (b) – Targets for electric recharging infrastructure dedicated to light-duty vehicles</u>	<u>Art. 4 (1) (a) (b) – Targets for electric recharging infrastructure dedicated to heavy-duty vehicles</u>	<u>Art. 6(1) – Targets for hydrogen refuelling infrastructure of road vehicles</u>	<u>Art. 11(1) – Targets for supply of LNG in maritime ports</u>
<p><i>Member States shall ensure a minimum coverage of publicly accessible recharging points dedicated to light-duty vehicles on the road network in their territory. Member States shall ensure that:</i></p> <p><i>a) along the TEN-T core network, publicly</i></p>	<p><i>Member States shall ensure a minimum coverage of publicly accessible recharging points dedicated to heavy-duty vehicles in their territory. Member States shall ensure that:</i></p> <p><i>(a) along the TEN-T core network, publicly accessible recharging</i></p>	<p><i>1. Member States shall ensure that, in their territory, a minimum number of publicly accessible hydrogen refuelling stations are put in place by 31 December 2030. To that end Member States shall ensure that by 31 December 2030 publicly</i></p>	<p><i>1. Member States shall ensure that an appropriate number of refuelling points for LNG are put in place at TEN-T core maritime ports [...] to enable seagoing ships to circulate throughout the TEN-T core network by 1 January 2025. Member States shall cooperate with neighbouring Member</i></p>

<p>accessible recharging pools dedicated to light-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of 60 km in-between them [...]</p> <p>b) along the TEN-T comprehensive network, publicly accessible recharging pools dedicated to light-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of 60 km in between them [...]</p>	<p>pools dedicated to heavy-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of 60 km in-between them [...]</p> <p>(b) along the TEN-T comprehensive network, publicly accessible recharging pools dedicated to heavy-duty vehicles and meeting the following requirements are deployed in each direction of travel with a maximum distance of 100 km in between them [...]</p>	<p>accessible hydrogen refuelling stations with a minimum capacity of 2 t/day and equipped with at least a 700 bars dispenser are deployed with a maximum distance of 150 km in-between them along the TEN-T core and the TEN-T comprehensive network. [...]</p>	<p>States where necessary to ensure adequate coverage of the TEN-T core network.</p>
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### UNIFE's assessment

- UNIFE **welcomes** the strengthened linkage between the TEN-T Networks and the roll-out of alternative fuels infrastructures, supported by the enactment of mandatory targets for Member States. These measures would support a more uniform and cross-border deployment of key infrastructures across Europe.
- UNIFE **calls** the Commission not to rule out the installation of hydrogen refuelling points for rail along the TEN-T (Core and Comprehensive) Networks, for which a derogation from the electrification requirement has been granted. This would be consistent with the provision, under the CEF2 Work Programme, of funding eligibility of hydrogen refuelling infrastructures for rail. The lack of any explicit reference to rail risks, on the contrary, to hamper the market uptake of clean technology in rail transport, where it has already shown a remarkable level of maturity.
- UNIFE **requests** that the non-TEN-T parts of the network are properly addressed by the proposal. It is estimated that about 70.000km of railway lines in the EU would remain not electrified once the TEN-T Networks have been completed. It is therefore urgent that strategies, at EU and national level, are considered to move away from diesel propulsion for railway services towards renewable energy sources.

### TEN-T Urban Nodes

The concept of TEN-T urban nodes remained rather missing in the former AFI Directive, which merely mentions "urban/suburban agglomerations and other densely populated areas".

UNIFE is a vocal supporter of the concept of "urban nodes" along the TEN-T Core Network. Urban nodes, at the crossroads between long-distance and metropolitan mobility, represent the strongest business case for the deployment of alternative fuels infrastructures. Urban nodes are also crucial to foster multimodality, with rail transport playing a central role for both passenger and freight.

### AFI Regulation proposal

- Recharging points and hydrogen refuelling stations along the Core and Comprehensive Networks would need to be accompanied with a complementary roll-out along the urban nodes – as defined in the TEN-T Regulation.

- Hydrogen refuelling stations should be also deployed within multimodal freight centres within the urban nodes, in order to potentially enable connections with rail and inland shipping.

<p><u>Recital (15)</u>  <i>Recharging infrastructure along the TEN-T network should be complemented with fast publicly accessible recharging infrastructure in urban nodes [...].</i></p>	<p><u>Recital (27)</u>  <i>[...] To ensure that publicly accessible destination refuelling is possible at least in the main urban areas, all urban nodes [...] should provide such refuelling stations. Within the urban nodes, public authorities should consider to deploy the stations within multimodal freight centres as those are not only the typical destination for heavy-duty vehicles but could also serve hydrogen to other transport modes such as rail and inland shipping.</i></p>	<p><u>Art. 13(1) (g) – National Policy Frameworks</u>  <i>[...]</i>  <i>That national policy framework shall contain at least the following elements:</i>  <i>[...]</i>  <i>g) measures to promote alternative fuels infrastructure in urban nodes, in particular with respect to publicly accessible recharging points;</i>  <i>[...]</i></p>
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### UNIFE’s assessment

- UNIFE **welcomes** the more significant role of TEN-T’s urban nodes in the framework of the AFI Regulation proposal since they are essential to link long-distance and metropolitan mobility.
- UNIFE **welcomes** the reference to rail as a pivotal enabler of multimodality, in the context of urban nodes’ freight centres.
- UNIFE **calls** for the strengthening of the requirements for public authorities in order to fully harness the potential of clean freight transport by rail.

### Research & Innovation (R&I)

The repealed Directive generally acknowledged that the Horizon 2020 Framework Programme was also to provide support for R&I with regard to alternative fuel vehicles and the related infrastructure – especially through to the Societal Challenge “Smart, green and integrated transport”.

Being the AFI Directive strictly abiding to the principle of technical neutrality, no direct reference was made to any partnership instrument or programme

UNIFE repeatedly stressed that continued R&I efforts are necessary to improve the competitiveness of alternative propulsion systems’ solutions, with a preferable focus for hydrogen fuels cells and battery-powered technology.

With regard to rail, UNIFE called for closer synergies between the forthcoming Joint Undertakings “Europe’s Rail” and “Clean Hydrogen”, within the Horizon Europe Framework Programme. Hydrogen’s collaborative research would be crucial to accelerating the production and integration of hydrogen components in the rail sector

### AFI Regulation proposal

- In the “Explanatory Memorandum”, it is pointed out that European research and innovation can drive, navigate, and accelerate the transformative Green Deal agenda – to which the AFI Regulation is instrumental.
- In the very same “Explanatory Memorandum”, the European Commission omits “Europe’s Rail Joint Undertaking” among those partnerships which are expected to play a key role in delivering a climate-neutral and environmentally friendly mobility.
- According to the “Explanatory Memorandum”, the primary synergies for Clean Hydrogen JU should be with Clean Aviation JU and the Zero Emissions Waterborne Transport partnership.
- In the complementary Communication “A strategic rollout plan to outline a set of supplementary actions to support the rapid deployment of alternative fuels infrastructure”, the Commission does point out the importance of synergies between Europe’s Rail JU and Clean Hydrogen JU in order to overcome technological barriers and make fuel-cell trains commercially viable.



- In each progress report, submitted by Member States to the Commission on the implementation of the national NPF, the annual public budget allocated to support alternative fuels RTD&D will have to be included.

<p><b>ANNEX I (7) – Reporting</b>  <i>The progress report referred to in Article 14(1) of the Regulation shall include at least the following elements:</i>  [...]  7) <i>research, technological development and demonstration (RTD&amp;D): annual public budget allocated to support alternative fuels RTD&amp;D, broken down by fuel and its origin, differentiating between fossil and renewable forms, and by transport mode.</i></p>	<p><b>Extract of the Explanatory Memorandum (page 5)</b>  [...]  <i>Next to the legislative proposal, the Commission will address the need for additional research and innovation (R&amp;I) activities, in particular through the co-programmed Zero Emissions Waterborne Transport partnership proposed by the Waterborne Technology Platform under Horizon Europe, the Clean Sky 2 Joint Undertaking and the Clean Hydrogen Joint Undertaking which works in synergy with these two transport partnerships.</i>  [...]</p>	<p><b>Extract of COM(2021) 560 final (page 13)</b>  [...]  <i>Over the coming years, three specific technological barriers need to be overcome before hydrogen fuel-cell technology can be considered for trains as commercially viable. These barriers are:</i>  1) <i>large-scale demonstration of multiple-unit train fleets;</i>  2) <i>development, engineering and prototype operation of shunters or mainline locomotives;</i>  3) <i>technology development for optimised hydrogen storage system for Fuel Cell Hydrogen (FCH) rail applications.</i>  <i>These three high-priority topics will be the focus of R&amp;I work, possibly by stepping up coordination between future European Partnership for transforming Europe’s rail system and European Partnership for Clean Hydrogen.</i>  [...]</p>
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### UNIFE’s assessment

- UNIFE **welcomes** the explicit assertion of the R&I relevance for the development of clean technologies alternative to fossil fuels, as well as the established linkage between Horizon Europe and the AFI Regulation.
- UNIFE **welcomes**, in the Communication’s strategic roll-out plan, the pivotal role attributed to synergies between rail and hydrogen’s collaborative-research in addressing technological barriers to the viability of fuel-cells hydrogen trains. However, UNIFE **questions** why these elements have been completely omitted from the Regulation’s Explanatory Memorandum.
- UNIFE **requests** that a reference to Europe’s Rail JU is made when outlining the R&I partnerships which are expected to deliver climate-neutral, environmentally friendly mobility. This will be just rational and wholly coherent with the objectives set in the Green Deal and the “Sustainable and Smart Mobility Strategy” – as well as with the ambition held by ER JU to drive forward the green and digital transition in Europe.

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