

## Position paper

# AERRL offers UNI its collaboration to avoid the negative impact of its «Prassi di Riferimento» on the harmonious development of ECM<sup>1</sup> activities in Italy

6 March 2026

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## 1. Executive summary

Following the withdrawal of the Italian NSA Decree ANSF 4/2012—concerning qualification of personnel performing essential safety tasks—after an ERA ruling, the Italian railway association Fermerci requested the Italian Standardisation Body (UNI) to develop a national best practice (*“Prassi di Riferimento”*, PdR).

On 12 February 2026, UNI published UNI/PdR 189:2026 *“Qualification of professionals working in railway traffic safety activities – Training requirements”*. This document was developed mostly by training centers rather than by ECM-certified organisations, even though a major part concerns vehicle maintainers and ECM competence requirements.

For ECM certification, Regulation (EU) 2019/779 applies. The process to define the competences for all ECM functions are strictly defined in Annex II, point 1.6. Any national practice must therefore remain coherent with this harmonised EU framework.

AERRL considers the newly published PdR is inconsistent with EU law, and potentially harmful for:

- interoperability,
- cross-border mobility of maintainers,
- the competitiveness of maintenance providers,
- the effective functioning of the Single European Railway Area (SERA),
- the harmonious development of ECM activities in Italy.

AERRL therefore proposes that the PdR should not be used as a normative basis and should instead be re-drafted after a formal discussion at EU level, ideally in the context of a future Common Safety Method (CSM) on competences.

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## 2. Background

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<sup>1</sup> ECM: Entity in Charge of Maintenance

Regulation (EU) **2023/1693** grants **exclusive responsibility** to Railway Undertakings (RUs) and Infrastructure Managers (IMs) to identify *essential safety tasks*, and to define competence requirements, training, assessment, and monitoring.

In alignment with this mandate, the Italian NSA (**ANSFISA**) issued **Decree 200/2025**, which:

- repeals the previous ANSF Decree 4/2012 and its annexes, including provisions relating to maintenance personnel,
- amends ANSF Decree 14/2009, limiting its scope only to the recognition of train-driver instructors and examiners.

This regulatory change should have aligned Italy with European law. However, the introduction of the PdR now re-introduces **national requirements** that go **beyond** or even **contradict** EU regulations.

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## 3. Key Concerns and Conflicting Elements

AERRL identifies several areas where the PdR **does not comply** with the European ECM framework.

### 3.1 National Redefinition of Safety-Critical Tasks

The PdR classifies all Vehicle Maintenance staff as performing safety-critical tasks. Under EU Regulation 2019/779, this identification must be risk-based and determined by the ECM within its Maintenance Management System (MMS).

**This creates barriers for:**

- **specialised maintainers from other Member States,**
- **ECM personnel qualified under a different national context,**
- **cross-border maintenance operations.**

### 3.2 Introduction of New Mandatory Roles (CQI, CQE, etc.)

The PdR establishes mandatory qualifications for:

- Classroom Instructors,
- Training Assistants,
- Designer Instructors,
- Examiners.

These roles, with formal certification (CQI, CQE), have no equivalent in EU Regulation 2019/779, which only requires ECMs to ensure competence through their own MMS.

**This excludes competent maintainers and trainers from other Member States.**

### **3.3 Creation of a National “Training Centre” (CdF) Structure**

The PdR requires training and qualification activities to be delivered exclusively by a UNI-recognised Training Centre (CdF).

This conflicts with EU law by de facto invalidating:

- training performed under the ECM-approved and certified Maintenance Management Systems,
- cross-border training provided by an ECM in another Member State.

**This creates a parallel national certification market, undermining EU harmonisation.**

### **3.4 Rigid Educational Prerequisites (EQF 4)**

The PdR imposes EQF Level 4 as a minimum educational requirement for all instructor roles. EU law allows flexibility, based on ECM risk assessment and internal procedures.

**This creates unnecessary barriers and excludes experienced practitioners lacking formal diplomas but possessing decades of proven competence.**

### **3.5 Prioritising National Certificates over ECM-Certified Competence**

The PdR focuses on issuing national certificates (CQP, CQI, CQE), replacing the EU principle that competence derives from the ECM’s certified MMS, not from national authorisation schemes.

This undermines:

- mutual recognition of competence,
- free movement of workers within the European Union,
- and the harmonised Single European Railway Area.

### **3.6 PdR Status and Applicability**

Although the PdR is not a mandatory standard, it cannot be ignored by ECMs operating in Italy because it deals directly with safety-related competence requirements.

**This creates ambiguity and regulatory pressure, despite lacking a solid EU legal foundation.**

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## **4. AERRL Position**

AERRL considers the PdR:

- contradictory to EU regulations,
- harmful to interoperability,

- **inconsistent with the principles of the ERA,**
- **misaligned with ERA guidance,**
- **an obstacle to cross-border maintenance operations,**
- **a source of unnecessary additional cost and administrative burden,**
- **harmful to the harmonious development of ECM activities in Italy.**

National norms must never introduce new requirements that go beyond EU law or create de-facto national certification schemes.

AERRL firmly believes that competence requirements must remain:

- **risk-based,**
- **ECM-defined,**
- **harmonised across Europe,**
- **proportionate,**
- **flexible,**
- **fully aligned with Regulation (EU) 2019/779.**

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## 5. Recommendations

AERRL recommends the following:

1. The current PdR should be withdrawn for all topics related to ECM and maintenance personnel.
2. A new version should be drafted, but only after a formal EU-level discussion, ideally contributing to a future CSM on Competences, ensuring alignment across all Member States.
3. The revised PdR should only serve as non-binding interpretative guidance, avoiding any Italy-specific obligations that exceed EU requirements.
4. ECM-certified organisations and AERRL must be involved in the drafting process, to ensure technical accuracy and alignment with maintenance practice.

AERRL stands ready to support UNI and Fermerci, offering

- its extensive experience in maintenance activities,
- its involvement in the revision of the ECM Guidelines,
- and its commitment to a competitive and interoperable European railway system.