

Topic nr	Topic	Reference document	Reference article	Issue	Recommendation
1	Timeline	Concept regelingstekst	Art. 13/14	The timeline and steps of the application and grant process are not sufficiently clear.	What is the earliest date at which an applicant can expect to sign a subsidy agreement with the lenW?
2	Amounts	Concept regelingstekst	Bijlage	Amounts need to be increased to take into account indexation, new market conditions and lessons learned from the prototype developments.	The amounts should be increased to take into account updated cost levels and the inflation until an expected execution period (after obtention of subsidies) expected by 2027-2028. Moreover, the execution of prototypes in the recent years have given indications on additional complexity of serial locomotive upgrades/retrofits, requiring more intensive work than originally planned. On this basis, it is recommended to increase the amounts foreseen in by 30% in order to cover
3	Subsidy cap	Concept regelingstekst	Art. 4	The subsidy cap should be increased in line with the comment nr 2	It is recommended to increase the subsidy cap by 30% (to 31.2M€) to take the higher individual contributions into account.
4	Duration of upgrade	Concept regelingstekst	Art. 6.3	The maximum downtime compensated by subsidies is capped at 4 weeks. This is the minimum to cover the upgrade works, but is not sufficient to cover the authorization downtime.	It is recommended to increase the maximum downtime for a serial upgrade/retrofit by 4 weeks. This is necessary in order to take into account the legal time for the obtention of a new authorization (20 calendar days).
5	Eligibility - age of the locomotives	Concept regelingstekst	Art. 5.4	The maximum age of locomotives is limiting the access to relevant locomotives that can participate to the ERTMS deployment in the Netherlands.	Some locomotives that could benefit from this program to deploy ERTMS in the Netherlands were constructed before 2004, but have received an ETCS BL2 retrofit after 1 Jan 2005. Is this a sufficient condition for eligibility?
6	Obligations - registration/use in NL	Concept regelingstekst	Art. 10	The requirement to have locomotives registered in the Netherlands needs to be clarified and adapted to take into account situations where the owner and investor is different from the operator.	The requirement of "10 days of registration" is not clear. When the owner is not the operator, it will be complicated to demonstrate that the locomotives will have been in circulation in NL during a specific period. However, it can be shown that the locomotive has an authorization to operate in the Netherlands after the upgrade/retrofit works.