Politics of the Low Countries
2025 – Volume 8
DOI: 10.54195/plc.21812



ARTICLE

# On the right track? Appraising twenty-five years of railway reforms in Belgium (1999-2024)

Damien Piron[1], Amandine Andrien[2], Tom Frénéa[1], Gatien Grommen[3], Alex Pierre[4] and Yanis Tambour[1]

## Abstract

This paper examines a key but neglected dimension of the European policy of railway liberalising: the separation between infrastructure management and transportation activities. Drawing upon Verhoest et al.'s (2004) multi-dimensional approach to autonomy and control, it assesses the autonomy of the Belgian railway infrastructure manager, Infrabel, through a longitudinal case-study (1999–2024) based on documentary analysis and semi-structured interviews. Next to its original empirical focus, this study brings a twofold contribution to debates on the national implementation of EU liberalisation policies. By highlighting the nuanced, dynamic, and negotiated nature of Infrabel's autonomy through time, it reaffirms the methodological relevance of in-depth case studies on bureaucratic autonomy—next to comparative survey questionnaires. Moreover, it demonstrates that the horizon of competition underlying liberalisation policies also influences railway reforms in countries such as Belgium, where this sector has hitherto not been privatised or liberalised (i.e. effectively submitted to competition).

**Keywords:** Liberalisation policies, Railway sector, Infrastructure management, Autonomy, Control

---

Politics of the Low Countries is published with financial support from the Fonds de la Recherche Scientifique-FNRS.

1 Department of Political Science, University of Liège (UR Cité), corresponding author: damien.piron@uliege.be
2 Federal Public Service (FPS) Mobility and Transport
3 Graduate in Political Science and Public Administration, University of Liège
4 Master's student in Political Science and Public Administration, University of Liège

## Introduction

In December 2022, the Green Federal Minister for Mobility, Georges Gilkinet, and Infrabel's managing director, Benoît Gilson, approved the latest performance contract of the Belgian railway infrastructure management company. Covering a period of a decade (2023–2032), this deal renewed a convention that had expired in 2012. It also aligned with the public service contract for the National Railway Company of Belgium (SNCB/NMBS), from which Infrabel has nevertheless been legally separated since 2005. A prerequisite for introducing competition among transportation companies, unbundling infrastructure management and transportation activities has been a key dimension of European policies for railway 'liberalisation'. Yet, debates on the national implementation of this strategy have hitherto largely focused on the latter dimension (Dyrhauge, 2013, 2022; Gutiérrez-Hita & Ruiz-Rua, 2019; Kaeding, 2008)—thereby neglecting the issue of infrastructure management.

Against this background, this paper analyses Belgian railway reforms over the latest quarter century through the case of Infrabel and the following research question: What is the actual level of autonomy of the infrastructure management company? Drawing upon Verhoest et al.'s (2004) multi-dimensional approach to autonomy and control, our longitudinal case study (1999–2024) highlights the nuanced, dynamic, and negotiated character of Infrabel's autonomy. Next to its original focus on the railway infrastructure management company, our analysis brings a twofold theoretical contribution to debates on the implementation of EU liberalisation policies (Clifton et al., 2007; Schmitt, 2013; Smith, 2005). By stressing the dynamic dimension of Infrabel's autonomy through time, it reaffirms the methodological relevance of in-depth, longitudinal case studies on bureaucratic autonomy—next to the predominant use of comparative survey questionnaires in the field of public management (Bezes & Jeannot, 2018; Maggetti & Verhoest, 2014). Moreover, by showing that Infrabel's level of autonomy ultimately hinges on governmental priorities towards railway policy (among which the exposure of SNCB/NMBS to competition), it demonstrates that the horizon of competition underlying EU liberalisation policies also affects railway reforms in countries (such as Belgium) where this sector has not (yet) been privatised or liberalised (i.e. actually submitted to competition).

The plan is as follows. The first part reviews the literature and outlines the conceptual framework of the paper. The second part sets out the research design. The third part displays the results of our empirical enquiry. The fourth part discusses these findings. Finally, the conclusion summarises the analysis and outlines avenues for future research.

# 1. Liberalising Railway in Europe: From a Single Idea(l) of Competition to Variegated National Trajectories

Although a unified transport system had long been a neglected component of the Single Market, the Single European Act (1987) put the submission of public monopolies in so-called 'network' industries (telecommunications, electricity, gas, railway transport, etc.) to competition back on the agenda (Hermann & Flecker, 2012). To improve efficiency and quality, the European Commission promoted a 'liberalisation' policy intended to foster competition—presented as an effective response to the needs of public service users or customers (Héritier & Lehmkuhl, 2008)—by removing barriers to private initiative and reshaping public monopolies on the model of a competitive market (Hall, 2002).

In the railway sector, over 25 years separated the first EU initiatives with the opening of domestic passenger transport services (Dyrhauge, 2013; Ross, 1998). Comparing privatisation pathways across policy sectors in the EU, Schmitt (2013) argued that, contrary to the telecommunications and postal sectors, exceptional rules have *decelerated* privatisation in the railways. Dyrhauge (2013, 2022) has highlighted the diverging interests of European institutions in regulating nationally-anchored railway policies and the resistance of member states to the Commission's initiatives for opening the railway market. Via the Council, national governments have reduced the speed and changed the direction of EU railway policymaking. A major bone of contention has been the extent to which EU internal market requirements should be limited by so-called 'services of general interests' (SGI) and how to define this elusive concept (Van de Walle, 2008).

Council Directive 91/440/EEC on the development of the Community's railways launched the liberalisation of the European railway market. It summed up the four objectives pursued by the EU as follows: ensuring the management independence of railway undertakings; separating the management of railway infrastructure from the provision of railway transport services; improving the financial structure of undertakings; and ensuring access to the networks of member states for international groupings of railway undertakings. This strategy was subsequently translated into four 'railway packages', which progressively liberalised the various components of this sector (Gutiérrez-Hita & Ruiz-Rua, 2019). In a nutshell, the first railway package (2001) established the key principle of unbundling transport and infrastructure management activities. From 2004, freight services were opened to competition. In 2007, the third railway package liberalised the international transport of passengers. Finally, regulation 2016/2338 aimed to complete the single European railway area by opening national markets for domestic passenger transport services. Such competition, in force since 2019, might take two forms: awarding a public service contract (competition *for* the market) and offering competing services (competition *on* the market).

A large number of studies have stressed the variegated implementation of European directives by member states, based on national case studies and transnational comparisons (Di Giulio, 2016; Engartner, 2010; Gutiérrez-Hita & Ruiz-Rua, 2019; Kaeding, 2008; Kestel, 2018; Lodge, 2003; Olsen, 2007). This literature underscores the importance of domestic contexts and the autonomy of national governments in reshaping their railway sector. The diverse trajectories of railway reforms across Europe can be summarised in the light of three interrelated concepts: liberalisation, privatisation, and marketisation (Hermann & Verhoest, 2012). *Liberalisation* policies seek to eradicate public monopolies through the introduction of competition (with public or private companies), whereas *privatisation* implies a transfer of ownership and structural control to private companies. Lastly, *marketisation* refers to "the introduction of market elements in public service provisions without providers competing for customers or contracts" (Hermann & Verhoest, 2012, p. 15). Such market-type mechanisms (management contracts, performance measurement, outsourcing, contractualization of employment, results-based funding, etc.) do not directly expose public bodies to competition but rather aim to make them act 'as if' this were the case. These forms of *re*-regulation (Majone, 1994) of the railway sector are the sectoral application of a wider neoliberal rationality, which does not imply a complete withdrawal of the state, but rather its active restructuring through market(-like) mechanisms (Piron & Evrard, 2023).

Gutiérrez-Hita and Ruiz-Rua (2019) distinguished between five trajectories regarding the introduction of competition in the railway passenger market in Europe. On the one hand, Great Britain and Sweden have fully liberalised their national rail markets—although Sweden has not fully privatised it, unlike the UK. On the other hand, in so-called 'non-liberalised' markets (such as France, Spain, Finland and Belgium), the incumbent transport company remains in charge of all public service obligations. Between these two poles, the degree of liberalisation of the railway sector ranges from 'extensive' (Austria, Germany, and Italy) and 'partial' (Netherlands, Czech Republic, and Portugal) to 'low' (Denmark and Poland).

However, this literature on the national transposition of EU railway directives tends to focus on transportation activities and to neglect infrastructure management. Splitting infrastructure management and transportation activities, historically bundled in monopolistic railway companies, is nevertheless a key prerequisite for introducing competition between transport companies. In addition to displaying the costs of performed services, such separation fundamentally restructures the relationship between transport operators, which are exposed to (the horizon of) competition between historic and new, public and private, national and international companies, as well as infrastructure managers, which are expected to efficiently serve their new 'clients' (Salento & Pesare, 2016).

In practice, such separation of functions may take three distinct forms (Solina & Abramović, 2022): accounting separation (railway services and infrastructure management belong to the same legal entity, but separate accounts are provided), organisational separation (railway services and infrastructure management are separated into subsidiaries within the same holding company), or institutional separation (services and infrastructure management belong to two different companies). Against this background, this paper aims to explore the implementation of the European obligation to separate infrastructure management and passenger transport activities in Belgium through the following research question: What is the actual level of autonomy of the Belgian infrastructure management company, Infrabel?

To answer it, we draw upon insights from the field of public administration on the tension between autonomy and control (Bezes & Jeannot, 2018; Verhoest et al., 2004, 2010; Yesilkagit & van Thiel, 2008). This body of literature has notably illustrated "the complexity of the concept of autonomy" (Bezes & Jeannot, 2018, p. 6), by stressing the potential gap between the formal-legal autonomy of a public organisation and its *de facto* autonomy (Yesilkagit & van Thiel, 2008). To offer nuanced accounts of this concept, public administration scholars have developed a multi-dimensional perspective. More precisely, Verhoest et al. (2004, pp. 105–106) highlighted the following six dimensions of autonomy: managerial autonomy (autonomy in financial and human resources management [HRM]); policy autonomy (autonomy to set processes and procedures, policy instruments, target groups and outcomes); structural autonomy (the protection from governmental influence through lines of hierarchy and accountability); financial autonomy (the degree of independence from governmental funding); legal autonomy (the legal protection to "prevent the government from altering the allocation of decision-making competencies"); and interventional autonomy ("the extent to which the agency is free from *ex post* reporting requirements, evaluation and audit provisions" and "from possible threats of government sanctions or interventions in the case of deviation"). On this basis, the reminder of this paper assesses the autonomy of Infrabel against the backdrop of the EU policy of railway liberalisation.

## 2. Research Design

This part summarizes the features of our interpretive methodology (2.1), before describing our case study on Infrabel (2.2) and the methods for generating and analysing evidence (2.3).

### 2.1 Interpretive Methodology: Features and Quality Criteria

An "underrepresented" tradition in public administration (Ospina et al., 2018, p. 598), interpretivism implies a series of shifts from (post-)positivist standards.

At the ontological level (the presuppositions about the "reality status"), it disproves the idea of a social reality waiting to be discovered, favouring subjective and plural realities of events. In contrast to the realist ontology underpinning (post-)positivist approaches, the focus of interpretive research is therefore "not on discovering laws about causal relationships between variables, but on […] understanding (*verstehen*) the motivations that lie behind human behavior" (Della Porta & Keating, 2008, p. 26). At the epistemological level (what is being studied and its "know-ability"), this implies minimising the distance between researchers and their object of study, with a view to producing contextualised explanations. Such involvement is not perceived as "a threat to knowledge claims or research trustworthiness", provided that researchers are "as transparent as possible" about how they generate and analyse their evidence (Schwartz-Shea & Yanow, 2012, pp. 80–81). At the methodological level (the "logic of inquiry"), interpretive research favours situated explanations, focusing on meanings and contextuality. It follows an abductive logic of enquiry, based on a flexible research design characterised by an absence of formalized hypotheses. Far from a lack of scientific rigour, such methodological flexibility instead represents "a mark of competence in interpretive research" (Schwartz-Shea & Yanow, 2012, p. 77).

Due to its features, specific quality criteria apply to interpretive research, such as trustworthiness, thick description, reflexivity, and intertextuality (Schwartz-Shea, 2014, pp. 131–134). First, trustworthiness "offers a way to talk about the many steps that researchers take throughout the research process to ensure that their efforts are self-consciously deliberate, transparent, and ethical" (Schwartz-Shea, 2014, p. 131). Second, thick description refers to the presence of "sufficient descriptive detail […] to capture context-specific nuances of meaning such that the researcher's interpretation is supported by 'thickly descriptive' evidentiary data" (Schwartz-Shea, 2014, p. 132). Third, reflexivity relates to an "admonition to reflect on one's research role" (Schwartz-Shea, 2014, p. 133). Lastly, intertextuality implies generating "diverse forms of evidence that can be 'read' intertextually for the ways in which texts, actions, events 'cite' one another (or fail to)" (Schwartz-Shea, 2014, p. 134). The next sections explain how we have sought to meet these requirements in our case study of Infrabel.

## 2.2 Case Study: A Longitudinal Analysis of Infrabel (1999–2024)

This article assesses the unbundling of infrastructure management and transportation activities in the Belgian railway sector through the case of Infrabel. Following Yin (2018, p. 15), "case study is an empirical method that investigates a contemporary phenomenon (the 'case') in depth and within its real-world context, especially when the boundaries between phenomenon and context may not be clearly evident". Consistent with our interpretive approach, this mode of inquiry is geared towards researchers who "want to understand a real-world case and assume that such an understanding is likely to involve important contextual conditions pertinent to your case" (Yin, 2018, p. 15).

Our unit of analysis, Infrabel, offers a relevant entry point for assessing the consequences of railway liberalisation in Belgium, as its creation in 2005 was a direct response to EU requirements to split infrastructure managers from transport operators. Yet, the infrastructure management company has remained understudied in comparison with SNCB/NMBS (see for instance De Broux, 2011; Deville & Verduyn, 2012; Van der Herten et al., 2001). To fill this gap, this paper offers a longitudinal analysis of Infrabel from the negotiations on the unbundling of the unitary rail company under the Verhofstadt government (1999–2003) to the performance contract signed under the De Croo government (2020–2025). This period encompasses two major railway reforms conducted in Belgium against the backdrop of liberalisation: organizational separation (in 2005) and institutional separation (since 2014).

Theoretically, the case of Infrabel offers insights on a railway company that is neither privatised nor liberalised. Indeed, the Belgian state remains the quasi-exclusive shareholder of Infrabel (owning over 99% of its shares). The latter has nevertheless been granted significant legal autonomy to conduct its missions, whose extent our analysis seeks to assess. This externally autonomous public company, which takes the legal form of a public limited company, has its own (politically appointed) management bodies: a Board of Directors made up of 14 Directors and an Executive Committee of 8 members. Besides, the management contract periodically concluded with the federal government provides Infrabel with a degree of managerial and policy autonomy.

An important issue regarding the boundaries of our case is the relationship between Infrabel and SNCB/NMBS. Infrabel being our sole unit of analysis, this paper does not offer in-depth examination of SNCB/NMBS, nor a systematic comparison between both railway companies. Nevertheless, our empirical findings highlight that, despite their formal separation, Infrabel and SNCB/NMBS remain deeply linked through interrelated missions, state control, a common HRM structure (HR Rail), significant commercial and financial relations (see part 4). Consequently, much empirical evidence generated on the case of Infrabel directly or indirectly referred to SNCB/NMBS—thereby explaining numerous, yet unsystematic, references in the empirical part.

### 2.3 Methods and Evidence

This study of Infrabel's autonomy is based upon two types of empirical sources: documentary analysis and semi-structured interviews. First, we analysed 62 documents relating to railway reforms in Belgium, falling into four categories: legal sources (EU Regulation and Directives, national laws and decrees), reports (Infrabel's annual reports and accounts, reports from EU and national institutions and consultancy firms), political documents (government agreements and Parliamentary debates) and other official sources (official press releases and websites; see Appendix 1).

Second, we conducted ten in-depth semi-structured interviews to ascertain how actors close to Infrabel assessed the autonomy of the railway management company (see Appendix 2). Consistent with the strategy of "mapping for exposure and intertextuality" characterising interpretative research (Schwartz-Shea & Yanow, 2012, pp. 84–89), we designed a reasoned interview logic intended to gather a wide range of viewpoints both from inside and outside the organization. Access to key informants was facilitated by personal contacts of the authors—particularly Amandine Andrien, who works for the Federal Public Service (FPS) Mobility and Transport.

Concretely, we conducted two waves of five interviews. The first wave was carried out in November and December 2022, as part of a master's course that led to a first report (Andrien et al., 2024). In February and March 2024, we conducted five additional interviews to gather additional viewpoints and further explore selected dimensions (such as the political rationale behind railway reforms, Infrabel finances, and the new performance contract). As our interviews were exclusively conducted with francophone respondents, it cannot be ruled out that direct exposure to the perspective of Dutch-speaking actors (instead of indirect exposure through the intertextuality of our materials) would have provided additional nuances.

Each interview was prepared through an individualised guide, based on a generic template offering flexibility to address additional relevant issues (see Appendix 3). All interviews were recorded (with one exception), then transcribed and analysed through thematic analysis (TA), consistent with the six phases identified by Braun and Clarke (2006). Once familiarised with the data (1), we generated initial codes (2), then started searching for themes (3)—a process characterised by a progression from description to interpretation. In line with our interpretative approach, we especially focused on the sources of tensions identified by our informants. Our TA was thus mostly inductive and prioritised the relevance of occurrences over their number. To somewhat sort out our vast amount of data, we have nevertheless deductively grouped our themes around three "conventional" components of public service reforms highlighted by Pollitt and Bouckaert (2017, p. 77): organisation, finance, and personnel. Subsequent revision of our themes (4) led us to stabilising our thematic map around the six dimensions of autonomy and control highlighted by Verhoest et al. (2004), prior to defining and naming our themes after them (5). Table 1 displays this thematic map, which serves as a guideline for the empirical report displayed in the following part (6).

**Table 1. Thematic Map: Dimensions of Autonomy and Control at Infrabel**

<table>
<tr><th></th><th>Autonomy</th><th>Control</th></tr>
<tr><td rowspan="2">Organisation</td><td>Organic autonomy<br>Institutional separation<br><br>= Legal autonomy</td><td>Appointment of Board & CEO<br>Government commissioners<br><br>= Structural control</td></tr>
<tr><td colspan="2">Management contract = policy autonomy vs. result-oriented control</td></tr>
<tr><td rowspan="2">Finance</td><td>Own revenues<br>Saving plans<br><br>= Managerial autonomy I: Operational financial autonomy</td><td>Debt sharing<br>Public grants<br><br>= Financial control</td></tr>
<tr><td colspan="2">Consolidation = financial control vs. operational financial autonomy</td></tr>
<tr><td rowspan="2">Personnel</td><td>Downsizing & outsourcing<br>Limited influence of unions<br><br>= Managerial autonomy II: Operational HRM autonomy</td><td>/</td></tr>
<tr><td colspan="2">HR Rail = constrained vs. growing strategic HRM autonomy</td></tr>
</table>

# 3. Results

This part outlines our empirical results on Infrabel's autonomy. Section 3.1 (Organisation) retraces the motives for and effects of organisational and institutional separations (*legal autonomy*) before examining the relationship between the federal government and Infrabel (*structural control*), through instruments such as the management contract (*policy autonomy* vs. *result-oriented control*). Section 3.2 (Finance) addresses the tension between *operational financial autonomy* and *financial control* by the state through the interrelated issues of debt transfers among railway companies, Infrabel's resources (including state subsidies), and the consolidation of the company. Lastly, section 3.3 (Personnel) scrutinises three dimensions: downsizing and outsourcing (*operational HRM autonomy*), the limited influence of trade unions, and the contested role of HR Rail (constrained vs. growing *strategic HRM autonomy*).

## 3.1 Organisation

The Verhofstadt I 'rainbow' government (1999–2003) was divided on the reform of the railway sector: the Green Minister for Transport and Mobility, Isabelle Durant, supported the creation of an independent regulator alongside the unitary SNCB/NMBS, whereas the Flemish Liberals called for the outright split of the latter. In the meantime, SNCB/NMBS's management, led by Karel Vinck, proposed to create two separate companies. This proposal would eventually be rejected by the government, as explained by the former CEO of Infrabel, Luc Lallemand:

> *Within the top of the SNCB/NMBS Group, one felt that moving towards a complete split of the mammoth of the time into two separate structures was "een stap te vlug en te ver" [one step too soon and too far]. So, Karel [Vinck] came back from the government saying: "no, this thing with two companies won't work. We must propose something with three".*[2]

In 2004, the liberal-socialist Verhofstadt II coalition eventually adopted a three-headed structure, based on the model of organisational separation (Figure 1). With this compromise, the Liberals obtained the break-up of the unitary SNCB/NMBS. In parallel, the umbrella structure reassured unions about the single statute of railway workers.

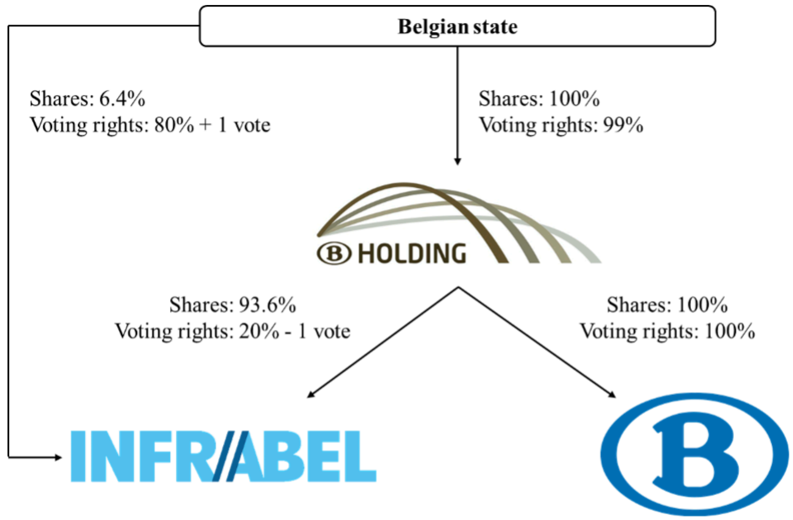


**Figure 1. The Organisational Separation of the Belgian Railway Sector (2005–2013)**

From 2005, the "SNCB/NMBS Group" consisted of three companies: SNCB/NMBS Holding, SNCB/NMBS (transport operator), and Infrabel (infrastructure management company). The legal successor to the unitary structure, SNCB/NMBS Holding was

2 Interview 8, Luc Lallemand, Former CEO of Infrabel (2005-2020), 28 February 2024.

headed by Jannie Haek (SP). This company was responsible for strategy and coordination within the Group and for transversal issues, including personnel. As the holding company, SNCB/NMBS Holding owned 100% of the shares in SNCB/NMBS. This company, led by Marc Descheemaecker (Open VLD), was responsible for the transport of passengers and freight. SNCB/NMBS Holding also retained 93,6% of the shares in Infrabel. This company, headed by Luc Lallemand (PS), was responsible for maintaining and developing the railway infrastructure.

Arguments in favour of organisational separation included avoiding distributing the debt of the unitary structure and centralising transversal functions to achieve economies of scale. However, conflicts soon arose between the three railway companies. Some stemmed from an inconsistent division of tasks and assets. For example, stations were divided between the Holding company (international stations), SNCB/NMBS (medium-sized stations), and Infrabel (unmanned stops). More generally, collaboration was conflictual as SNCB/NMBS and Infrabel sought to increase their autonomy towards the holding company, notably by internalising competences such as IT and HRM (see 3.3).

In 2008, consulting firm Roland Berger recommended to Inge Vervotte (CD&V), then Minister for Public Enterprises, to split SNCB/NMBS and Infrabel while maintaining integrated HR management. In parallel, the European Commission served Belgium with a formal notice (2008), then a warning (2009) due to Infrabel's alleged lack of autonomy. According to some interviewees,[3] Infrabel actively used European directives to put the Belgian government under pressure with a view to strengthening its autonomy. As a response, the government prohibited to combine functions within Infrabel and the other two railway companies. Finally, the Buizingen accident, which caused the death of 19 passengers in 2010, kept rail safety and collaboration within the SNCB/NMBS Group high on the political agenda.

Consequently, the coalition agreement of the Di Rupo government (2011–2014) set to "restructure the Group, with a reduction in its entities [...] in order to better meet the needs of passengers and ensure more coherent management, while achieving economies of scale" (Belgian Federal Government, 2011, p. 151). To this end, Minister Paul Magnette (PS) proposed to merge SNCB/NMBS Holding and SNCB/NMBS so as to split the SNCB/NMBS Group into two entities: the infrastructure management company (Infrabel) and the transport operator (SNCB/NMBS). This proposal enjoyed broad political support, except for the Greens (in opposition) and trade unions. Infrabel's and SNCB/NMBS's CEOs also publicly advocated for abolishing the holding

3 Interview 9, FPS Mobility and Transport (1), 13 March 2024.

company (Gracos, 2013, pp. 8–13). The institutional separation between the "new" SNCB/NMBS and Infrabel was moderated by a new subsidiary, responsible for coordinating recruitment and HRM in both state-owned companies: HR Rail (Figure 2).

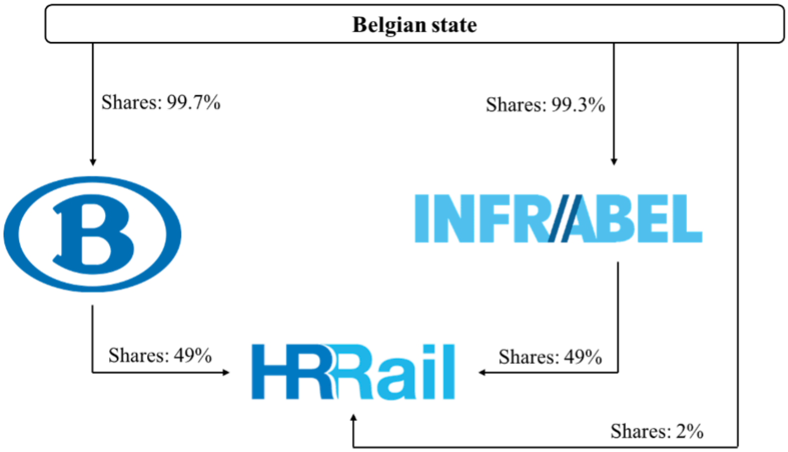


**Figure 2. Institutional Separation of the Belgian Railway Sector (Since 2014)**

This reform, which entered into force in January 2014, should be analysed in the light of negotiations on the fourth European railway package, then underway. Initially, the European Commission proposed to liberalise the domestic transport of passengers, but also to impose institutional separation. Against this backdrop, the Belgian government preferred to reform the structure of its railway sector instead of abandoning the direct award of the internal market to the incumbent operator.[4] By abolishing SNCB/NMBS Holding and moving towards institutional separation, Belgium strengthened the position of the Commission against countries with an overarching structure, such as France and Germany. Faced with their opposition, this dimension was nevertheless dropped from regulation 2016/2338.

Our empirical investigation shows that major coordination issues remain between SNCB/NMBS and Infrabel, despite intended rationalising. During the 2014 reform, "the furniture of the household was divided [...] a bit like in a divorce, sometimes a bit arbitrarily".[5] The controversial allocation of stations to SNCB/NMBS (rather than Infrabel) illustrates this point. In addition to its economic consequences, due to the

4 Interview 9, FPS Mobility and Transport (1), 13 March 2024.
5 Interview 5, SNCB/NMBS, 9 November 2022.

commercial value of stations, this choice also affects the phasing of works: as some parts of the stations belong to Infrabel (like the tracks), both companies are continually required to interact. This "very atypical"[6] situation could also hinder the liberalising of the railway sector in Belgium: As the owner of stations, SNCB/NMBS could have to adjudicate on access requests submitted by its hypothetical competitors.

In December 2022, the federal government and Infrabel signed a ten-year performance contract—thereby ending the application of the latest management contract, which had expired in 2012. Between 2013 and 2022, the continuity of public service had been guaranteed through provisional rules, unilaterally imposed by the federal government. Infrabel's performance contract sets out the company's objectives, the conditions for exercising and financing its public service missions, and the expected performance in various areas such as safety, accessibility, and finance. Performance is measured through 15 key performance indicators, monitored by the FPS Mobility and Transport.

However, a closer analysis shows that this contract *de facto* increases Infrabel's policy autonomy and refinancing, with limited performance expected in return. According to an advisor to Georges Gilkinet, the Minister of Mobility under the De Croo government (2020–2025), the railway company benefited from a strong negotiating position, due to the Green Minister's willingness to impose soft targets with the aim of refinancing Infrabel as much as possible. As a result, performance management appears rather weak in this contract, notably in comparison with the "more sophisticated" contract of the SNCB/NMBS—justified by the aim of preparing the transport operator for hypothetical competitive tendering at the end of its monopoly in 2032, as explained in the following quote:

> *In terms of efficiency, I think there is virtually nothing in Infrabel's contract. [...] With Infrabel, we had a rather purely budgetary discussion [...]: "We're giving you so much. What can you do for us in terms of investment, maintenance...?" In the case of SNCB/NMBS, we went into more detail, with a description of the number of trains per hour that would run on this and that line over the next decade [...] and a relatively fine-grained cost model.*[7]

This tendency for Infrabel to increase its autonomy from the government seems confirmed by the limited implementation of structural control tools. For instance, the company's directors and senior managers enjoy some autonomy from the political parties that appointed them. Moreover, the right of veto of governmental

6 Interview 5, SNCB/NMBS, 9 November 2022.
7 Interview 10, Advisor to the Green Minister for Mobility (2020-2025), 21 March 2024.

commissioners is "hardly ever used in practice", as it is likened to an "atomic bomb" whose use is deemed "insulting"[8] towards the autonomy of the Board—which also includes representatives of the Minister's party. More generally, several interviewees external to Infrabel concurred that "the power of government over autonomous public companies is relatively weak".[9] This view is nevertheless contested. An insider stresses that the autonomy of Infrabel management bodies should be relativised, since the federal government remains the company's almost exclusive shareholder:

> *There's no escaping it [...]: when a major shareholder in the Board of directors of a big company says, "I don't want this or that... I'd prefer the priority to be this", one listens to them, right? [...] The Belgian State is treated and behaves like any other major shareholder in any large company [...].*[10]

## 3.2 Finance

Railway debt management has regularly led to accounting manoeuvres between EU institutions and national governments willing to invest in their railway network without deteriorating public accounts (Piron, 2024). When the unitary SNCB/NMBS was unbundled in 2005, railway debt was shared between SNCB/NMBS Holding (€4.8 billion) and the Railway Infrastructure Fund (RIF; €7.4 billion), a new off-balance-sheet agency created to remove railway debt from Belgian public accounts (Deville & Verduyn, 2012). However, this scheme was questioned by Eurostat and the National Accounts Institute, which eventually decided in 2008 to 'consolidate' the RIF within the general government sector, thereby significantly worsening the 2005 accounts. The architect of this accounting operation, former Infrabel CEO Luc Lallemand, downplays the fiscal consequences of this decision: "Nobody cared because these were the 2005 accounts and a moment of shame is easily forgotten".[11] Instead, he emphasises the significance of this debt transfer (authorized by the EU Commission with the aim to financially 'stabilize' domestic railway companies prior to liberalisation) to justify his "strict management" of the company:

> *I regularly used this motto to explain the rigorous management approach within Infrabel: 'one-time, last time'. 'One-time' is why we succeeded. 'Last time' means 'we need to draw lessons from this with regard to the future'. [...] 'Last time' is to say to everyone—politicians, management, but also railway workers: "OK, for all sorts of*

8 Interview 10, Advisor to the Green Minister for Mobility (2020-2025), 21 March 2024.
9 Interview 9, FPS Mobility and Transport (1), 13 March 2024.
10 Interview 3, Infrabel, 25 November 2022.
11 Interview 8, Luc Lallemand, Former CEO of Infrabel (2005-2020), 28 February 2024.

> *good and bad reasons, we messed up a bit with public finances in the 1990s, and we also messed up a bit in some public companies, but that's over".*[12]

A decade later, the transition towards institutional separation led to (re)distribution of the debt of SNCB/NMBS Holding. As a result, Infrabel inherited the part of historical debt that was attributable to network management activities, but also 45% of a residual debt shared between Infrabel and SNCB/NMBS. Consequently, Infrabel's debt increased by more than €1.5 billion in 2014 to €2.5 billion (Court of Audit, 2016, p. 165). The political rationale behind this transfer was to relieve SNCB/NMBS in anticipation of future competition, as the following quote explains:

> *The guiding principle was that since SNCB/NMBS would be subject to competition. We would try to burden the infrastructure management company as much as possible, which they didn't like, obviously. Because we had stored everything within the Holding company. So, we looked for this historical debt and put everything that wasn't directly linked to the transport mission in the hands of the infrastructure manager, saying: "The monopolist will continue to survive no matter what".*[13]

In 2022, Infrabel's debt amounted to €3.8 billion, distributed between short-term (€800 million) and long-term debt (€3 billion). Yet, our informant at the cabinet of Minister Gilkinet argues that this figure remains "very low"[14] when compared with other relevant indicators. First, the total balance sheet of the company was worth €23.9 billion in 2022 (Infrabel, 2023). Second, the value of its tangible fixed assets (railway infrastructure, buildings, land, etc.) reached €19.5 billion. Third, the remainder of Infrabel's liabilities was made up of capital subsidies from the state, akin to transfers that the company will never have to repay to its almost exclusive shareholder.

From an accounting perspective, Eurostat concluded in 2018 that Infrabel's sales did not cover half of its costs. Consequently, the company was 'consolidated' into the general government sector—as had been the case with the RIF in 2008 and almost all network management companies across Europe. As a result, Infrabel's financial results directly impact the calculation of Belgium's public deficit and debt (in contrast to SNCB/NMBS). Surprisingly, our interviews reveal that this situation has not (yet) reduced the company's operational financial autonomy. On the contrary, Infrabel took advantage of its consolidation to refinance its loans through the Belgian Debt Agency (BDA), thereby reducing its exposure to financial markets. In addition, against the backdrop of the refinancing foreseen by the performance contract, Infrabel

12 Interview 8, Luc Lallemand, Former CEO of Infrabel (2005-2020), 28 February 2024.
13 Interview 9, FPS Mobility and Transport (1), 13 March 2024.
14 Interview 10, Advisor to the Green Minister for Mobility (2020-2025), 21 March 2024.

concluded in November 2023 a €1 billion loan with the BDA, rather than the European Investment Bank, as was encouraged by the government due to more advantageous financial terms. In short, one interviewee stated that "the autonomy granted by the 1991 law [on autonomous public companies] is much more powerful than the constraints imposed by their status as a 'consolidated' body".[15]

Infrabel's consolidation nevertheless prompted a shift in its revenues, which amounted to €2.8 billion in 2022 (i.e. before the refinancing planned by the new performance contract; see Table 2). To enable Infrabel's deconsolidation, the infrastructure fee paid by transport operators had been maintained at a relatively high level in the past. This was criticised by SNCB/NMBS, which argued that it hindered the development of its transport offer. Following the consolidation of Infrabel, the federal government decided to reduce the amount of the infrastructure fee by €321.2 million, to €427.8 million in 2022. Although fully compensated by an increase of Infrabel's operating subsidy, this decision clearly reaffirmed the financial control of the Belgian government on the company.

**Table 2. Infrabel's Simplified Income Statement (2022)**

| **Revenues** | **€2,811,356,194** | **p.c.** |
|---|---|---|
| **1) Operating revenues, among which** | **€ 1,763,532,360** | **62.7%** |
| Turnover, among which | € 771,011,930 | 27.4% |
| *Infrastructure fee* | *€ 427,754,897* | *15.2%* |
| State funding (operating grant) | € 485,288,137 | 17.3% |
| Own production | € 480,726,933 | 17.1% |
| **2) Capital grant** | **€ 730,916,432** | **26.0%** |
| **3) Financial income** | **€ 316,907,402** | **11.3%** |
| | | |
| **Costs** | **€ 2,898,574,787** | **p.c.** |
| **1) Operating charges, among which** | **€ 1,705,357,784** | **58.8%** |
| Personnel costs | € 856,558,626 | 29.6% |
| Supplies and other consumables | € 218,982,883 | 7.6% |
| Energy and other goods | € 212,143,172 | 7.3% |
| Infrastructure maintenance | € 152,446,818 | 5.3% |
| **2) Depreciation and impairments** | **€ 882,859,348** | **30.5%** |
| **3) Financial costs** | **€ 310,357,655** | **10.7%** |
| | | |
| **Result** | **€ -89,793,042** | **/** |

Source: own calculations based on Infrabel (2023)

15 Interview 10, Advisor to the Green Minister for Mobility (2020-2025), 21 March 2024.

In 2022, the subsidy paid by the Belgian state to Infrabel amounted to €1.2 billion (43.3% of its revenues). This amount encompassed two main grants: on the one hand, current expenses (operating expenses, salaries, etc.) were funded by an operating grant of €485.3 million (known as 'OPEX', for 'operating expenses'); on the other hand, Infrabel's investments were funded by a capital grant of €730.9 million (known as 'CAPEX' for 'capital expenses').

The adequacy of state subsidies is controversial. Political and administrative actors argue that Infrabel enjoys advantageous public funding. They point out that by European standards, it is exceptional for a government to fully fund the investments of the infrastructure management company. Moreover, the subsidy of Infrabel is fixed and does not depend on its performance. It is also asserted that the company's management constantly tends to demand public refinancing, without seeking to increase its own revenue. Finally, Infrabel is said to have little difficulty in adapting the pace of its investment to its resources:

> *Infrabel has regular investments. They have always coped with it, as long as Infrabel has existed [...]: they just do with what they have, that's all. And when they run out of money, well, they stop the works and that doesn't really bother them.*[16]

For their part, actors closer to Infrabel point to the structural lack of resources from which the rail sector is suffering in their view. They recall that Infrabel faced successive reductions of state subsidies throughout the 2010s: Whereas the SNCB/NMBS Group had already adopted a cost-saving plan under the Di Rupo government, the Michel government (2014–2020) endorsed significant additional cuts in subsidies. Consequently, the business plan approved by Infrabel's Board of Directors in 2017 aimed at major savings, by speeding up digitalisation but also cutting operating costs and further reducing staff (Infrabel, 2018, p. 37). More generally, some interviewees question the match between Infrabel resources and missions: They feel that Infrabel's new resources are insufficient to meet the requirements set by the government. They also appear cautious about the refinancing foreseen in the performance contract, suggesting a possible discrepancy between governmental commitments and the amounts that will eventually be paid to Infrabel. Finally, they point to

16 Interview 9, FPS Mobility and Transport (1), 13 March 2024.

a mismatch between the political vision of infrastructure and Infrabel's operational needs, arguing that the government unduly favours capital expenditure ('CAPEX') to the detriment of network maintenance ('OPEX'):

> *When you spend money on CAPEX, you get the impression that you're doing something tangible, that you can understand and communicate to your electorate. And I understand that CAPEX is intellectually easier to grasp. But the reality is that if you build CAPEX, you build tracks. So, at some point, you're going to have to maintain them.*[17]

## 3.3 Personnel

The most notable trend in Infrabel's personnel management is a major contraction in employment, which has exceeded 30% of the workforce since its creation: In 2023, the company employed 9,554 full-time equivalents (FTEs), compared with 13,628 in 2005 (Figure 3). This can be explained by several factors: the non-replacement of retiring staff, the automation of tasks, and significant increase of productivity, resulting from the concentration of 365 signalling stations spread across the country into ten cabins and the grouping of around 300 workstations into 44 integrated logistics centres. Former CEO Luc Lallemand describes this "improvement of the industrial tool" as his "obsession" during his fifteen-year term at the head of Infrabel.[18]

For their part, unions argue that Infrabel workers are being subjected to "ever-increasing pressure to do more with less": They highlight the lack of staff in operating structures and compare HRM within the company to "a thread about to break".[19] In response, Infrabel performance contract plans a (slight) increase in employment (see Figure 3). Another consequence of downsizing is the emergence of a "subcontracting culture"[20]: Major projects are outsourced to private service providers, with Infrabel staff content to carry out preventive and corrective maintenance. The main motivation is budgetary: having controllable cost items that can be adjusted to the available resources. Yet, unions are concerned about the scale of outsourcing, fearing deteriorating safety conditions and increased accident risks.

---

17 Interview 3, Infrabel, 25 November 2022.
18 Interview 8, Luc Lallemand, Former CEO of Infrabel (2005-2020), 28 February 2024.
19 Interview 6, Christian Trade Union, 19 February 2024.
20 Interview 6, Christian Trade Union, 19 February 2024.

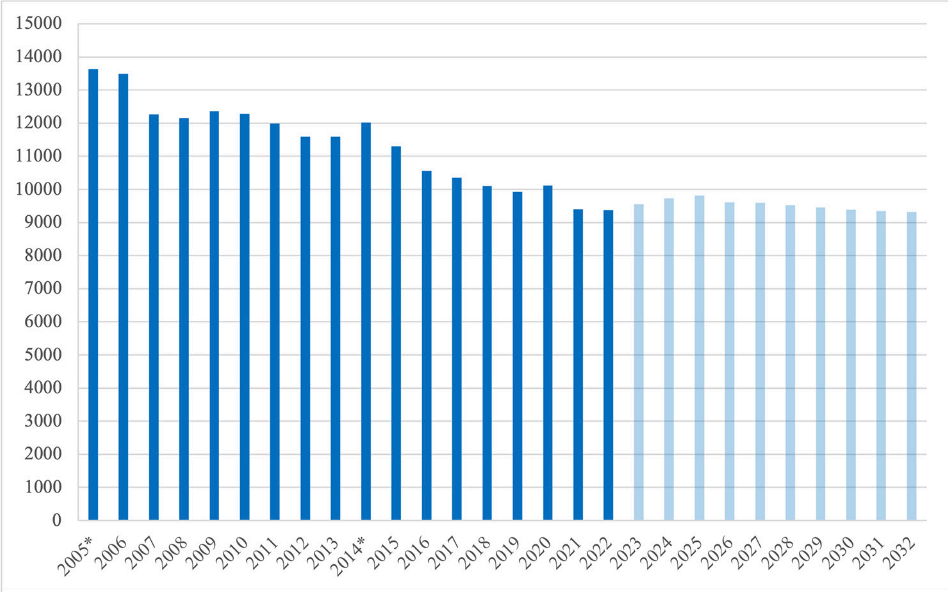


**Figure 3. Infrabel Staff (2005–2032), in Full-Time Equivalents (FTE)**

Sources: Infrabel annual reports and performance contract (2023–2032)

These developments can be interpreted as a result of the declining influence of railway unions. Although still involved in consultative bodies, trade unions were excluded from the Board of Directors of the (then unitary) railway company in 2002. Minister Durant (Ecolo) then sought to increase the authority of the Board of Directors by splitting the positions of director and manager (at that time exclusively held by Socialists and Social Christians). In return, the liberal parties demanded that the two representatives of the trade unions be removed from the Board. As the former Green Minister sums up:

> *SNCB/NMBS was a rather unusual model, in which the managers were also members of the Board and the unions sat on the Board with the managers. […] I wanted to reform this system to make the company a little less 'friends of friends decide everything amongst themselves'. […] I wanted to get the managers out, so that they would take on the role of managers reporting to the Board, and not as members of the Board themselves. Of course, I had to negotiate this with the coalition partners and at that point, the Liberals said, "Let's get the unions out, too". It wasn't my main battle, but it was part of a compromise that I accepted. I accepted it even more because I didn't really see the added value of having them on the inside to do their job as unions.*[21]

21 Interview 7, Isabelle Durant, Former Green Minister for Transport and Mobility (1999-2003), 26 February 2024.

When the unitary railway company was split in 2005, a single employment structure was maintained at SNCB/NMBS Holding to safeguard the single statute of railway workers, at the request of the union. However, Infrabel and SNCB/NMBS failed to respect the division of competences within the SNCB/NMBS Group. In practice, both companies took over personnel management missions assigned to the Holding, as explained in this quote:

> *Infrabel was not happy with the HR function. It was already trying to take over activities little by little, year after year by saying, "We're going to do the advertising and recruitment campaigns ourselves".*[22]

In 2014, the creation of HR Rail was supposed to mitigate the transition from organisational to institutional separation. Though presenting this structure as "symbolically important" due to its role in social dialogue, one trade union representative nonetheless describes it as an "empty shell" and the "weak link in the structure".[23] In comparison with the three-headed model, the HR subsidiary currently occupies a subordinate position towards Infrabel and SNCB/NMBS. In addition, HR Rail has limited resources to carry out its tasks. As a result, the other two state-owned companies had no hesitation in increasing their HRM autonomy by creating their own HR department. The following extract highlights this gap between the rationale behind the creation of HR Rail and its concrete working:

> *In 2013, it was: "Mum and Dad are getting divorced and they're going to have a baby together: it's HR Rail". They didn't particularly want it. [...] It's something that was put in place [...] to satisfy the trade unions, by saying: "We're keeping the single statute and we're going to put HR Rail in the law, look how beautiful that is!" But in reality, both companies have their own HRM policies, which are not necessarily the same.*[24]

Infrabel and SNCB/NMBS display increasingly divergent preferences in terms of recruitment and employment relations. According to one trade union official, "the statutory nature of employment [...] does not create a problem at SNCB/NMBS", while Infrabel favours "a trend towards contractual employment".[25] The following extract highlights different corporate cultures at SNCB/NMBS and Infrabel:

22 Interview 5, SNCB/NMBS, 9 November 2022.
23 Interview 2, Socialist Trade Union, 18 November 2022.
24 Interview 9, FPS Mobility and Transport (1), 13 March 2024.
25 Interview 2, Socialist Trade Union, 18 November 2022.

*There has been a change in mentality and in the companies' philosophy, which is very different. [...] [Infrabel] is a much more modern company, much more in tune with the way companies and organisations operate today. And I find that at SNCB/NMBS... Obviously, they are also starting out with very concrete and very strong constraints, but I find that they are still very much in the old regime.*[26]

This divergence partly stems from the profile of the staff recruited by both companies and the competition faced by Infrabel to recruit specialised profiles, such as engineers and technicians. In this context, the single statute of railway workers is portrayed as a rigid tool, reducing the company's attractiveness compared with its private competitors. Although there is little data on this subject, Minister Gilkinet indicated that in November 2020, Infrabel counted 12.4% contract staff among its 10,133 employees (Belgian Chamber of Representatives, 2021). However, the proportion of contract employees is much higher in recent recruitments: In 2020, it stood at 36.6% (266 out of 726). Contractualising is also pronounced among managers, as Infrabel no longer recruits engineers on a statutory basis.

## 4. Discussion: (Re)assessing Infrabel's Autonomy – Nuanced, Dynamic, and Negotiated

This discussion stresses three key dimensions of Infrabel's autonomy, namely its nuanced, dynamic, and negotiated features. Firstly, our empirical findings display a nuanced picture of Infrabel's autonomy based on the six dimensions highlighted by Verhoest et al. (2004). In essence, the company enjoys a significant degree of *legal autonomy* and *operational managerial autonomy*, whereas the federal government retains *structural control* and *financial control*. Moreover, our analysis shows variable results regarding *policy autonomy* and *result-oriented control*.

Infrabel's most developed dimension of autonomy is arguably its *legal autonomy*. Since 2005, this externally autonomous company has been imbued with its own legal personality, missions, assets, and management bodies. In 2014, the transition towards institutional separation further extended its legal autonomy, notably towards the SNCB/NMBS. Moreover, Infrabel enjoys notable *operational managerial autonomy* both in financial and HRM areas. This is illustrated by its ability to generate its own revenues and the cost-saving plans adopted in the 2010s (*operational financial autonomy*), as well as noticeable downsizing of the workforce and growing outsourcing (*operational HRM autonomy*). However, the federal government maintains *structural control* over Infrabel, notably through the appointment

26 Interview 3, Infrabel, 25 November 2022.

of its CEO and entire Board of Directors. Although used cautiously in practice, the oversight minister also has the power to exercise *ex ante* control over decisions of the company through governmental commissioners. Moreover, the Belgian state keeps exercising strong *financial control*: In 2022, public grants accounted for 43% of Infrabel resources. Besides, the reduction of infrastructure fees demonstrates the government's ability to structurally alter Infrabel's sources of income—hence the company's lack of *strategic financial autonomy*.

Secondly, our analysis highlights the dynamic nature of Infrabel's autonomy, depending on the actual implementation of a series of managerial instruments. The management contract is a case in point: By allowing the company to participate in defining its objectives and how to achieve them, it strengthens its *policy autonomy* vis-à-vis political (and administrative) oversight authority—particularly in comparison with the unilateral extension by the government experienced between 2013 and 2022. In return, Infrabel is supposedly subjected to *result-oriented control* by the government, based on performance indicators. However, close examination of the latest performance contract shows that its control function is limited and secondary to the political objective of refunding the railway company. Similarly, Infrabel's consolidation has not (yet) resulted in increased *financial control*. On the contrary, it seems to have increased its *operational financial autonomy*, as exemplified by the loan concluded with the FDA against the advice of the supervising minister. It nevertheless remains to be seen whether this conclusion will hold firm under the more stringent budgetary policy conducted by the De Wever government (Evrard & Piron, 2025). Lastly, the common railway employer, HR Rail, formally constrains Infrabel's *strategic HRM autonomy*. Yet, the limited resources of this subsidiary have enabled Infrabel to bypass this division of tasks and develop its own HR policy, increasingly based on contractual recruitment.

While a significant part of the literature on bureaucratic autonomy emphasises the heterogeneity *between* organisations (Meyer & Hammerschmid, 2010; Verhoest et al., 2010), our analysis thus highlights heterogeneity *within* a single organisation over time. It demonstrates that autonomy is not static, but dynamic and periodically re-enacted in the implementation of a series of instruments whose effects may vary over time. In line with the theory of public policy instrumentation (Lascoumes & Le Galès, 2007), which has long highlighted the unintended effects of policy tools, this paper reaffirms the methodological relevance of in-depth, longitudinal and interpretive case studies to assess whether given public policy instruments actually strengthen or reduce organisational autonomy. In other words, our nuanced empirical findings demonstrate the value of contextualised analyses of organisational autonomy and control, next to survey questionnaires largely used to measure and compare both phenomena through the self-perception of managers and "very limited empirical data"—sometimes limited to one person per agency or country, as recalled by Bezes and Jeannot (2018, p. 6).

Thirdly, the above-mentioned instruments demonstrate Infrabel's ability to increase its autonomy in the implementation phase. Yet, this additional degree of autonomy is also precarious, as it is negotiated with the federal government and conditional on its (tacit) agreement. As a quasi-exclusive shareholder, the latter can promptly strengthen its control over the company by more strictly applying its control prerogatives. In addition, it may also unilaterally change the rules applicable to Infrabel, thereby potentially reducing its autonomy—for instance by curtailing its own sources of financing or not renewing its management contract. This stresses the "relational nature" of bureaucratic autonomy (Maggetti & Verhoest, 2014, p. 250), which is never irreversibly acquired or lost, but periodically renegotiated.

Consequently, the objectives of the federal government regarding railway policy ultimately appear to be the key explanatory factor of Infrabel's actual degree of autonomy. In practice, these goals fluctuate depending on strategic, legal, fiscal, and political motives such as transposing European requirements, making budgetary savings and efficiency gains or re-financing the railway sector, and preparing SNCB/NMBS to competition. This last dimension highlights the close ties that still bind the two Belgian railway companies, despite their legal separation. When their demands come into tension (e.g. regarding debt sharing or the infrastructure fee), our empirical analysis has shown that the government tends to rule in favour of SNCB/NMBS, due to Infrabel's lack of exposure to competition. This conclusion contributes to debates on the implementation of the European policy of public service liberalisation (Clifton et al., 2007; Schmitt, 2013; Smith, 2005) by showing that the horizon of competition also impacts national railway reforms in a country such as Belgium, where this sector has not (yet) been privatised or effectively submitted to competition (liberalised).

## Conclusion

A prerequisite for introducing competition between transportation companies, the unbundling of infrastructure management and transportation activities has been relatively neglected by the literature on the EU railway liberalisation policy. To shed light on this understudied yet key dimension, this paper has questioned the autonomy of the Belgian infrastructure management company, Infrabel. To this end, we conducted a longitudinal case study of Infrabel (1999–2024) based on documentary analysis and semi-structured interviews. Drawing upon Verhoest et al.'s (2004) multi-dimensional approach to the concept of autonomy, our results highlight the nuanced, dynamic, and negotiated nature of this company's autonomy.

Next to its innovative empirical focus on Infrabel, our examination brings a twofold contribution to debates on the implementation of EU liberalisation policies. By highlighting the dynamic nature of Infrabel's autonomy over time (depending on the actual implementation of a series of policy tools), it reaffirms the methodological relevance of in-depth case studies on this phenomenon—next to comparative survey questionnaires, which dominate the field of public administration. In addition, it demonstrates that the horizon of competition underlying EU liberalisation policies also influences railway reforms in countries, such as Belgium, where this sector has hitherto not been privatised or liberalised (i.e. effectively submitted to competition).

At this stage, many questions remain as to the evolution of the railway sector in Belgium. For instance, the De Wever government formed in early 2025 has so far confirmed Infrabel's investment scheme. However, it remains to be seen whether the company will effectively be able to escape the consequences of fiscal austerity. The government also calls for "modernising" railway personnel policy and transferring HR missions to Infrabel and SNCB/NMBS (Belgian Federal Government, 2025, p. 104). Does it foreshadow the outright abolition of HR Rail and the end of the (no longer so) unitary status of railway workers at a time when the status of civil servants is being critically challenged (De Visscher et al., forthcoming)? More generally, will this right-wing government accelerate the liberalisation or privatisation of the railway sector in Belgium? And is the latter up to the challenge of ecological transition?

Theoretically, our refined empirical results call for extending such in-depth, longitudinal research designs to other national settings and 'network' sectors (telecommunications, electricity, gas, etc.) to improve our understanding of the consequences of liberalisation policies on bureaucratic autonomy, the transformation of public organisations, and the quality of public services.

## References

Andrien, A., Frénéa, T., Grommen, G., Pierre, A., Tambour, Y., & Piron, D. (2024). Une restructuration qui va bon train : analyse de la libéralisation du secteur ferroviaire en Belgique du point de vue d'Infrabel. *Administration Publique (Trimestriel)*, *47*(1), 27–44.

Belgian Chamber of Representatives. (2021). *Response from the Deputy Prime Minister and Minister of Mobility to written question n° 55-222: Infrabel – Staff*. https://www.lachambre.be/QRVA/pdf/55/55K0051.pdf.

Belgian Federal Government. (2011). *Coalition agreement*. https://www.lachambre.be/kvvcr/pdf_sections/searchlist/Accord_de_Gouvernement_1er_decembre_2011.pdf.

Belgian Federal Government. (2025). *Coalition agreement*. https://www.belgium.be/sites/default/files/resources/publication/files/Accord_gouvernemental-Bart_De_Wever_fr.pdf.

Bezes, P., & Jeannot, G. (2018). Autonomy and managerial reforms in Europe: Let or make public managers manage? *Public Administration*, *96*(1), 3–22. https://doi.org/10.1111/padm.12361.

Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, *3*(2), 77–101. https://doi.org/10.1191/1478088706qp063oa.

Clifton, J., Comín, F., & Díaz Fuentes, D. (Eds.). (2007). *Transforming public enterprise in Europe and North America: Networks, integration and transnationalization*. Palgrave.
Court of Audit. (2016). Evaluation of the implementation of management contracts concluded with SNCB, Infrabel and SNCB-Holding. https://www.ccrek.be/sites/default/files/Docs/2016_09_SNCB_ContratsGestion.pdf.
De Broux, P. O. (2011). *Le droit des industries de réseaux (1830–2010) : une histoire de l'évolution du rôle de l'État fondatrice d'un droit du service public*. [Docotral dissertation, Université Saint-Louis-Bruxelles.] DIAL.pr. https://dial.uclouvain.be/pr/boreal/object/boreal:173472.
De Visscher, C., Fallon, C., Piron, D., & Schram, F. (forthcoming). Civil service and public administrations in Belgium. In M. Reuchamps, M. Brans, P. Meier, & É. Van Haute (Eds.), *The Oxford Handbook of Belgian Politics*. Oxford University Press.
Della Porta, D., & Keating, M. (2008). *Approaches and methodologies in the social sciences: A pluralist perspective*. Cambridge University Press. https://doi.org/10.1017/CBO9780511801938.
Deville, X., & Verduyn, F. (2012). Implementation of EU legislation on rail liberalisation in Belgium, France, Germany and The Netherlands. *National Bank of Belgium Working Paper*, 221, 1–154. https://www.nbb.be/en/publications-research/publications/all-publications/implementation-eu-legislation-rail.
Di Giulio, M. (2016). Reshaping state structure and strategy: The reform of railway policy in Germany and Italy. *International Journal of Public Administration*, *39*(3), 226–237. https://doi.org/10.1080/01900692.2015.1004084.
Dyrhauge, H. (2013). *EU railway policy-making: On track?* Palgrave.
Dyrhauge, H. (2022). Transforming a steam train: A historical institutionalist analysis of EU railway policy. *Journal of European Integration*, *44*(6), 855–870. https://doi.org/10.1080/07036337.2021.2012465.
Engartner, T. (2010). German rail reform: Railway policy realigned for the capital markets. *International Journal of Public Policy*, *6*(1–2), 73–86. https://doi.org/10.1504/IJPP.2010.031207.
Evrard, Z., & Piron, D. (2025). Décoder l'Arizona : l'accélération d'un néolibéralisme aux accents autoritaires. *Politique – Revue de Débats*. https://www.revuepolitique.be/decoder-larizona-lacceleration-dun-neoliberalisme-aux-accents-autoritaires/.
Gracos, I. (2013). Grèves et conflictualité sociale en 2012. II. Secteur public et questions européennes. *Courrier hebdomadaire du CRISP*, *2174–2175*(9), 7–86. https://doi.org/10.3917/cris.2174.0007.
Gutiérrez-Hita, C., & Ruiz-Rua, A. (2019). Competition in the railway passenger market: The challenge of liberalization. *Competition and Regulation in Network Industries*, *20*(2), 164–183. https://doi.org/10.1177/1783591719858737.
Hall, D. (2002). EU competition policies and public services. *Transfer: European Review of Labour and Research*, *8*(2), 198–213. https://doi.org/10.1177/102425890200800205.
Héritier, A., & Lehmkuhl, D. (2008). The shadow of hierarchy and new modes of governance. *Journal of Public Policy*, *28*(1), 1–17. https://doi.org/10.1017/S0143814X08000755.
Hermann, Ch., & Flecker, J. (Eds.). (2012). *Privatization of public services: Impacts for employment, working conditions, and service quality in Europe*. Routledge. https://doi.org/10.4324/9780203119600.
Hermann, C., & Verhoest, K. (2012). The process of liberalisation, privatisation and marketisation. In C. Hermann & J. Flecker (Eds.), *Privatization of public services: Impacts for employment, working conditions, and service quality in Europe* (pp. 6–32). Routledge.
Infrabel. (2018). *Annual report to shareholders (2017)*. https://infrabel.be/sites/default/files/generated/files/report/rapport_annuel_infrabel_2017_fr.pdf.
Infrabel. (2023). *Consolidated financial statements*. https://fr.ftp.opendatasoft.com/infrabel/I-FBA/ComptesAnnuels_Jaarrekening/Data_FR_ComptesAnnuelsConsolides_2022.pdf.
Kaeding, M. (2008). Lost in translation or ahead: The transposition of EU directives across states. *European Union Politics*, *9*(1), 115–143. https://doi.org/10.1177/1465116507085959.
Kestel, L. (2018). *En marche forcée : une chronique de la libéralisation des transports*. Raisons d'Agir.

Lascoumes, P., & Le Galès, P. (2007). Understanding public policy through its instruments—From the nature of instruments to the sociology of public policy instrumentation. *Governance*, *20*(1), 1–21. https://doi.org/10.1111/j.1468-0491.2007.00342.x.

Lodge, M. (2003). Institutional choice and policy transfer: Reforming British and German railway regulation. *Governance*, *16*(2), 159–178. https://doi.org/10.1111/1468-0491.00212.

Maggetti, M., & Verhoest, K. (2014). Unexplored aspects of bureaucratic autonomy: A state of the field and ways forward. *International Review of Administrative Sciences*, *80*(2), 239–256. https://doi.org/10.1177/0020852314524680.

Majone, G. (1994). The rise of the regulatory state in Europe. *West European Politics*, *17*(3), 77–101. https://doi.org/10.1080/01402389408425031.

Meyer, R. E., & Hammerschmid, G. (2010). The degree of decentralization and individual decision making in central government human resource management: A European comparative perspective. *Public Administration*, *88*(2), 455–478. https://doi.org/10.1111/j.1467-9299.2009.01798.x.

Olsen, S. (2007). Fragmentation and coordination in the Scandinavian railway sector. *International Review of Administrative Sciences*, *73*(3), 349–364. https://doi.org/10.1177/0020852307081146.

Ospina, S. M., Esteve, M., & Lee, S. (2018). Assessing qualitative studies in public administration research. *Public Administration Review*, *78*(4), 593–605. https://doi.org/10.1111/puar.12837.

Piron, D. (2024). Governing public investment in Europe: The politics of off-balance-sheet policy-making, the rise of Eurostat and contrasted regional policies in Belgium. *Competition & Change*, *28*(3–4), 494–514. https://doi.org/10.1177/10245294241242843.

Piron, D., & Evrard, Z. (Eds.). (2023). *Le(s) néolibéralisme(s) en Belgique – Cadre macroéconomique, applications sectorielles et formes de résistance*. Academia.

Pollitt, C., & Bouckaert, G. (2017). *Public management reform: A comparative analysis* (4th ed.). Oxford University Press.

Ross, J. (1998). *Linking Europe: Transport policies and politics in the European Union*. Praeger Publishers.

Salento, A., & Pesare, G. (2016). Liberalisation and value extraction: The trajectory of railway in the neo-liberal state. *Partecipazione e Conflitto*, *9*(2), 466–494. https://doi.org/10.1285/i20356609v9i2p466.

Schmitt, C. (2013). The Janus face of Europeanisation: Explaining cross-sectoral differences in public utilities. *West European Politics*, *36*(3), 547–563. https://doi.org/10.1080/01402382.2012.749651.

Schwartz-Shea, P. (2014). Judging quality: Evaluative criteria and epistemic communities. In D. Yanow & P. Schwartz-Shea (Eds.), *Interpretation and method: Empirical research methods and the interpretive turn* (2nd ed., pp. 120–146). Routledge.

Schwartz-Shea, P., & Yanow, D. (2012). *Interpretive research design: Concepts and processes*. Routledge. https://doi.org/10.4324/9780203854907.

Smith, M. P. (2005). *States of liberalization: Redefining the public sector in integrated Europe*. State University of New York Press.

Solina, K., & Abramović, B. (2022). Effects of railway market liberalisation: European Union perspective. *Sustainability*, *14*(8). https://doi.org/10.3390/su14084657.

Van de Walle, S. (2008). What services are public? What aspects of performance are to be ranked? The case of "services of general interest". *International Public Management Journal*, *11*(3), 256–274. https://doi.org/10.1080/10967490802301260.

Van der Herten, B., Van Meerten, M., & Verveurgt, G. (Eds.). (2001). *Sporen in Belgie: 175 jaar spoorwegen, 75 jaar NMBS*. Leuven University Press.

Verhoest, K., Peters, B. G., Bouckaert, G., & Verschuere, B. (2004). The study of organisational autonomy: A conceptual review. *Public Administration and Development*, *24*(2), 101–118. https://doi.org/10.1002/pad.316.

Verhoest, K., Roness, P. G., Verschuere, B., Rubecksen, K., & MacCarthaigh, M. (2010). *Autonomy and control of state agencies: Comparing states and agencies*. Palgrave.

Yesilkagit, K., & van Thiel, S. (2008). Political influence and bureaucratic autonomy. *Public Organization Review*, *8*(2), 137–153. https://doi.org/10.1007/s11115-008-0054-7.

Yin, R. K. (2018). *Case study research and applications: Design and methods* (6th ed.). Sage.

## Appendix 1. Sources of the documentary analysis

| Documents (N=62) | Description |
|---|---|
| **Legal sources (N=29)** | – EU Regulation and Directives (N=9)<br>– National laws (N=6) and decrees (N=14) – including management and performance contracts (N=2) |
| **Reports (N=15)** | – Infrabel's annual reports and annual accounts (N=5)<br>– Reports from EU institutions (EU Commission and Eurostat), national institutions (Court of Audit, NAI) and consultancy firm (N=10) |
| **Political documents (N=8)** | – Government agreements (N=5)<br>– Parliamentary debates (N=3) |
| **Other official sources (N=10)** | – Official press releases (N=5): federal government and ministers<br>– Official websites (N=5): Infrabel, Infrabel Open Data, HR Rail, SNCB/NMBS, Regulatory body |

## Appendix 2. Summary of the interviews

| # | Organisation | Date | Recording | Duration (min.) |
|---|---|---|---|---|
| 1 | FPS Mobility and Transport | 04-11-2022 | Yes | 60 |
| 2 | Socialist Trade Union | 18-11-2022 | Yes | 80 |
| 3 | Infrabel | 25-11-2022 | Yes | 68 |
| 4 | Federal Parliament | 07-12-2022 | Yes | 75 |
| 5 | SNCB/NMBS | 09-12-2022 | Yes | 91 |
| 6 | Christian Trade Union | 19-02-2024 | No | 57 |
| 7 | Isabelle Durant, Former Green Minister for Transport and Mobility (1999–2003) | 26-02-2024 | Yes | 58 |
| 8 | Luc Lallemand, Former CEO of Infrabel (2005–2020) | 28-02-2024 | Yes | 100 |
| 9 | FPS Mobility and Transport (3 interviewees) | 13-03-2024 | Yes | 96 |
| 10 | Advisor of the Green Minister for Mobility (2020–2025) | 21-03-2024 | Yes | 101 |
| **Duration of interviews** | | | **Total** | **786** |
| | | | **Average** | **78.6** |



Politics of the Low Countries – DOI: 10.54195/plc.21812

# Appendix 3. Generic interview guide

## Introduction

- Presentation of the research objectives
- Presentation of the interviewee: current and past functions and links with Infrabel

## Organisation of the railway sector and Infrabel

### *Organisation of the railway sector*

- How do you explain the transition from a unitary structure to organisational and institutional separations? What are the advantages and disadvantages of each model?
- How are missions shared between Infrabel, SNCB/NMBS and HR Rail? Do you find this system efficient?
- What are the relationships and main sources of tension between Infrabel and SNCB/NMBS?

### *Organisation of Infrabel*

- What are the advantages and disadvantages of the status of autonomous public company?
- What are the relationships and main sources of tension between Infrabel and the government/supervising minister?
- What are the various forms of control exercised over Infrabel by the government?
- What is the role of the management contract? How is it negotiated and implemented?

## Budget and finances

- What are Infrabel's main resources and expenses? How have they changed over time?
- What are the financial relationships between Infrabel and the Belgian State? Do you think that the level of public funding is sufficient?
- Do you think that Infrabel's debt is significant? What are the reasons for its evolution over time?

## Personnel

- What is the influence of trade unions within Infrabel? How has this changed over time?
- What are working conditions at Infrabel? How have they changed over time?
- What are the tasks of HR Rail? What are its relationships with Infrabel?