



**National Investigation Body (NIB) Network**

# **NIB Peer Review Report for**

*NIB SPAIN*

***Review date: 6-7 November 2024***

## Peer Review Report - Record of changes

The following table records changes **during completion of individual NIB Peer Review Reports**. Modifications to the template (ie modifications to the report template) are tracked through the Handbook document control record.

Version	Date	Changes
V0.0		First draft report
V0.0		First send draft report
V0.1		Final Version

On behalf of the Peer-review Panel

## PART 1 – INTRODUCTION

This report describes a Peer Review of a National Investigation Body (NIB) undertaken to meet the requirements of Article 22.7 of the European Directive on Rail Safety dated 11 May 2016 (EU 2016/798). The Article states:

The investigating bodies, with the support of the Agency in accordance with Article 38(2) of Regulation (EU) 2016/796, shall establish a programme of peer reviews where all investigating bodies are encouraged to participate so as to monitor their effectiveness and independence.

The investigating bodies, with the support of the secretariat referred to in Article 38(2) of Regulation (EU) 2016/796, shall publish:

- (a) the common peer-review programme and the review criteria; and
- (b) an annual report on the programme, highlighting identified strengths and suggestions for improvements.

The peer review reports shall be provided to all investigating bodies and to the Agency. Those reports shall be published on a voluntary basis.

The Peer Review seeks to monitor the effectiveness and independence of a NIB by considering its organization, processes and outputs (eg accident reports, safety recommendations, annual reports). The Peer Review process also seeks to assist development of all NIBs by sharing with them strengths and suggestions for improvements identified during reviews.

The Peer Review is based on the NIB responses to a questionnaire and on a site visit in which peer reviewers visit the NIB. Details of the questionnaire and the review criteria are given in the NIB Peer Review Handbook for the year in which the review was carried out. This can be found at [\[https://www.era.europa.eu/agency/stakeholder-relations/national-investigation-bodies/nib-network-european-network-rail-accidents-national-investigation-bodies\\_en\]](https://www.era.europa.eu/agency/stakeholder-relations/national-investigation-bodies/nib-network-european-network-rail-accidents-national-investigation-bodies_en).

The Peer Review relies on answers given by the NIB in the questionnaire and during the site visit. The Peer Review process is not intended to fully investigate all issues covered by the questionnaire and does not address all issues in the documents used as review criteria. It is targeted at issues where the reviewers believe there will be greatest value to the NIB being reviewed and to other NIBs.

This peer review report has been prepared by the NIB peer review team in the frame of the common peer-review programme established by the investigating bodies in accordance with Article 22(7) of the Directive (EU) 2016/798 on railway safety.

The NIB peer review team examined data during the peer review of the NIB using the process described in the Peer Review Handbook. The collection of data was based on the review of some documents, internal procedures or case studies provided on a voluntary basis, as well as on interviews with management and other staff members of the NIB.

The report reflects the collective judgement of the peer-review team regarding the findings resulting from the peer-review process. However, the individual members of the peer-review team and their NIBs are not liable for the contents of the report and/or for any omissions.

The peer review report will be provided to all investigating bodies and to the European Union Agency for Railways. It is owned by the reviewed NIB and shall not be published or supplied to other parties without the prior written consent of this NIB.

## PART 2 – BACKGROUND AND STATISTICS

*The information in the following tables is taken from the completed questionnaire.*

Table A – NIB & Review Information	
National Investigation Body (NIB)	CIAF
NIB type (eg multi-modal)	Single Modal
Date questionnaire completed by NIB	13/09/2024
Date of site visit	6 and 7 November 2024
Date of draft report for consultation	22 <sup>nd</sup> November 2024
Date of comments by NIB Spain	12 <sup>th</sup> December 2024
Date report finalised by Peer Review Panel	16 <sup>th</sup> December 2024
Peer Review Panel members (name/state)	1. Leslie Mathues (NIB BE) 2. Dominique Louis (RAIB) 3. Petr Mencl (NIB CZ)
Observers (name/state)	1. Anita Koprivnjak (ERA) - Excused 2. Angelo Daprile (NIB Lu)
Route length of track in NIB's country	15.840
Traffic in NIB's country (train-kilometres per year)	168,75

Table B – NIB Staffing		
<b>B1</b>	Number of permanently employed rail investigators (including part time workers).	5
<b>B2</b>	Full time equivalent number of permanently employed rail investigators.	4
<b>B3</b>	Full time equivalent number of administrative staff permanently employed on rail investigators.	2
<b>B4</b>	Number permanently employed rail investigators who can act as Investigator in Charge.	5
<b>B5</b>	Are there investigators not permanently employed by the NIB who can be employed on an ad hoc basis. Briefly explain the contractual arrangements.	No
<b>B6</b>	Full time equivalent number of investigators from other modes that can assist rail investigators	No

**Table C – NIB Activity in the Last 3 Years (includes any joint investigations)**

		Heavy rail			Metro railways		Trams		Other (trolleybus, cable car, etc.)	
		Article 20(1) accidents	National law requirement outside Article 20(1)	Discretion to investigate other events	National law requirement	Discretion to investigate other events	National law requirement	Discretion to investigate other events	National law requirement	Discretion to investigate other events
<b>C1</b>	In NIB scope?	Yes	No	Yes (article 20.2)	No	Yes	No	Yes	No	Yes
<b>C2</b>	Number of notifications per year averaged over last 3 years	0,33		96						
<b>C3</b>	Average number of accidents investigated per year*	0,33		3,67						
<b>C4</b>	Average number of incidents investigated per year*	Not applicable to Article 20(1) investigations		2,67						
<b>C5</b>	Average number of full investigation reports published per year	1		4,33						
<b>C6</b>	Average number of briefing notes (or similar short documents) published per year	-		-						
<b>C7</b>	Average number of recommendations produced per year	5		18						

\* includes accidents and incidents for which the NIB carries out significant investigation work (e.g. attends site and/or obtains significant amounts of evidence) but no full report, briefing note, etc. is published

**Table D – Outcome of recommendation made during the last 5 Years**

		Heavy Rail		Metro railways	Trams	Other (narrow gauge)
		Article 20(1) accidents	Other investigations			
	<i>Proportion of recommendations accepted to be implemented by the final implementers</i>					
<b>D1</b>	Proportion of recommendations implemented effectively within a reasonable* time period	<b>20</b>	<b>20</b>			
<b>D2</b>	Proportion of recommendations implemented effectively but after an excessive delay*	<b>13</b>	<b>6</b>			
<b>D3</b>	Proportion of recommendations reported as implemented but not implemented effectively*	<b>47</b>	<b>37</b>			
<b>D4</b>	Proportion of recommendations reported as not implemented	<b>20</b>	<b>37</b>			
	<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>N/A</b>	<b>N/A</b>



**Table E - Number of joint investigations with other NIBs - Averaged over 3 Years**

<b>E1</b>	Deployed (Some or all work undertaken out of the office)	No
<b>E2</b>	Not deployed (All work undertaken from the office)	No

**Table F - Number of ongoing investigations and average times to complete investigations**

		<i>At the time of completing the questionnaire</i>
<b>F1</b>	Investigations required by Article 20(1)	0
<b>F2</b>	National law requirement outside Article 20(1)	NA
<b>F3</b>	Non-mandatory accidents and incidents	3
<b>F4</b>	Other investigations (e.g. class investigation)	0
<b>F5</b>	Average time to complete mandatory investigations (average of investigations completed in previous three years) Reports published 2020 - 2022	19.3
<b>F6</b>	Average time to complete non-mandatory investigations ((average of investigations completed in previous three years) Reports published 2020 - 2022	12.7

## Comments of NIB on data provided in tables A to F and strengths and difficulties that it identifies itself

### Comments of NIB

In table D, we have considered a five-year recommendation issuing period from 1-jan-2019 to 31-dec-2023. For the state of implementation, we have considered up to 30-jun-2024.

Also in table D (D1 and D2), we have considered a period of 2 years as “reasonable”, and a period of more than 2 years as “excessive delay”.

In D3 we understand that final implementers have adopted measures, but the NSA has not closed the recommendations yet.

In F3 we include 3 preliminary enquiries (not officially open “full investigations”).

### Some strengths of the Spanish NIB:

- The advice of the members of the board: besides their official duties as a decision-making body, the board of the CIAF also gives support to the investigators, acting as specialized consultants, giving advice and sometimes providing training (although they don't participate in the report development). They can do that as they are very experienced and prestigious experts on the several fields of the railway world, and their support is truly appreciated for helping investigators (investigators are engineers, but often specialized in just one field, and with much less experience than them).
- The simplicity of the internal structure: the internal structure of the NIB is very simple and «horizontal», and that allows a fluid information exchange and a smooth team working, reducing bureaucracy and facilitating contact (everybody is «next door»). A more hierarchical and complex (partitioned) structure could add difficulties to our work, as we can see when we need to get support from the Ministry.

Procedures and/or practices which we consider to be particularly effective and which could be a particularly good example to other NIBs:

- As said before, the role of the board as a permanent «council of the wise» is very useful for guiding and instructing the investigators in their tasks.
- We have two rounds of reviewing of draft reports by the secretary and the board, one of them before sending the draft to the stakeholders, and the second one after their feedback.
- Investigators draft the reports and the board approves them, introducing changes if they consider it necessary. To prevent the appearance of serious divergences between the investigator's and the board's criteria (which could seriously delay or paralyze the investigation), we usually hold periodic “informal” follow-up meetings between the investigators and the board, in which discrepancies are solved in advance.

Difficulties (legal, organisational, resource availability and practical) which mean we cannot perform you job in the way you would like to.

- The lack of a territorial structure: the centralization of the NIB in Madrid is a hinder to the on site deployment of the investigators, which is almost exclusively reserved for really serious accidents. The lack of regional delegations, in a country with the size of Spain, makes difficult to reach quickly an accident site, especially when a big share of the occurrences happen in the coastal rim (Catalonia, Galicia, Valencia, Andalusia), some 400~600 kms away from the NIB offices. Too many times the complications to get to the place in a reasonable time have made us to renounce to going there
- There are a number of changes that have been talked about in recent years: not depending on the ministry to organize travel, modifying the board's procedures to speed up decisions, having our own laboratories and evidence stores, a territorial structure to facilitate deployment, having staff specialized in legal or psychological matters (not just engineering), having our own press and public relations departments....

## PART 3 – COMMENTS FROM PEER REVIEW PANEL

### Legal framework (100 series questions in questionnaire)

- Directive (EU) 2016/798 of the European Parliament and of the Council of 11 May 2016 on railway safety (recast) seems to have been implemented in the national legislation.
- The legislation gives the NIB immediate access to the accident site. However, the exercise of this power may require prior approval by the judicial Authority where necessary (Article 75 law 38/2015 of 29 September 2015).
- The NIB appears to be independent in its organisation, legal structure and decision-making from other organisations. The work of the NIB is occasionally affected by the work of the Judicial Authorities.
- The NIB is up to now a single modal organisation. A recent law was published in August 2024 and the NIB will become a multimodal accident investigation organisation in the near future.
- The NIB is constituted of two entities: a board and a secretariat. The president of the board is appointed by parliamentary commission of transport based on proposition of the minister. The president is appointed for a period of 6 years.
- The other members of the board are appointed by the minister after communication with the parliamentary commission (art. 73 Ley 38/2015). The board members are appointed for a period of 6 years.
- The board freely appoints the Secretary (head of the technical staff) among qualified civil servants, and technical investigators and administrative staff is chosen by public competition among qualified civil servants. The secretary and the rest of the staff answer to the board.
- The NIB prepared a draft MOU with the Judicial Authority but has struggled to get the Judicial Authority to sign the MOU. The need for an MoU is foreseen in article 13 §6 of Royal Decree 623 of 18 July 2014 which specifies the terms of cooperation between the NIB and judicial authority.

### **Type of investigations undertaken & NIB organisation (200 series questions in questionnaire)**

- The NIB investigates occurrences as provided for in art. 20.1 (serious accidents) and 20.2 (other accidents and incidents at the discretion of the NIB) according to Directive (EU) No 2016/798.
- The NIB has a permanent Secretary, 3 permanent coordinator investigators and 2 permanent investigators. The NIB also has 2 administrative staff.
- The board is made up of one president and 5 members. The president and members all work part time.
- The NIB is active in the NIB community and participates at the NIB Network meetings. The NIB has volunteered to be peer reviewed.
- The NIB and NSA have agreed on having a general meeting twice a year. These meetings include a general reviewing of pending recommendations and an exchange of information on specific accidents/incidents.
- The NIB monitors several performance indicators (consultation time, number of reviewed events,...) in the annual report.
- The NIB can use external experts in the investigation process.
- Investigators can and do use the expertise of the Board members.

### **Processes and Resources (300 series questions in questionnaire)**

- The NIB is funded directly by the Ministry of transport who pays for the salary of the people employed.
- The NIB has a regular allocation of 50.000 € in the General Government Budget for technical expertise.
- The NIB does not have a specific budget for equipment.
- The NIB has no investigator on duty: the deployment of investigators is on a voluntary basis. In the event of a notification, the Secretary contacts the investigators to check their availability to go on site (the secretary himself and senior investigators are subject to availability for immediate deployment, although there is no fixed schedule). When possible, the aim is to send at least two investigators: one experienced investigator and one junior investigator for training purposes.
- The NIB deployments are hence limited and usually reserved for major accidents.
- Because of the location of the NIB and the size of the country, the NIB is generally not able to send investigators to the accident site immediately. This means that in some cases the investigators need several hours or more to reach the accident site.

- The NIB has a “VIP” access to a 24/7 service for transport and accommodation dealt by the ministry travel service (via a contracted travel agency). The investigators can use a dedicated car to travel to the accident site or more frequently make their way to the accident site by other means (train ,plane).
- The NIB can nominate 6 Investigators in Charge (IIC): the Secretary and the 5 investigators.
- The NIB resource plan is not complete and carries two vacancies. The recruitment of 2 other investigators is difficult as the salary are not competitive compared to industry and because of the lack of allowance when on-call or when being deployed.
- The NIB can assign non-permanent experts to assist in specific investigations when necessary but the administrative procedures make the appointment of an expert during the site phase burdensome.
- The NIB has developed several useful guidance documents (e.g.: on human factors, technical investigation, report) .
- The NIB does not have any facilities or equipment for technical examinations, either on site or in the offices.
- The NIB has a secure working location at its headquarters.
- The NIB has developed an investigation process which is used to monitor progress of the investigations.

#### **Training arrangements (400 series questions in questionnaire)**

- The NIB has a specific training program for new starters: they undergo a series of basic trainings before beginning to work, and then they act as a junior investigator to an investigation team. The basic “starting pack” training is about 50 to 70 hours.
- The NIB has access to training provided by industry stakeholders and to training programs of the Ministry as any other branch of the Ministry, using the same established and documented processes.
- The training organised by the NIB tries to be as “universal” as possible, so as to give all the investigators the same background knowledge.
- The NIB has no practical on-site training.
- The NIB does not plan regular refresher training.
- The NIB has a budget for training, but the investigator may need to pay in advance and get reimbursed. This does not encourage investigators to book on external training events.

### Notification & decision process (500 series questions in questionnaire)

- The NIB states in a procedure the types of occurrences that must be notified. Sometimes, however, the IM fails to notify some of them.
- The NIB is informed of an immediate occurrence but it may take some time for the notification to come in (sometimes more than 2 hours).
- Occurrences are usually notified via SMS by the IM (more seldom by other stakeholders via e-mail) to the president of the board and to the secretary, 24/7.
- The NIB immediately requests the basic information from the involved IM and/or RU. The updates on the initial information are made at NIB request.
- The NIB carries out a preliminary study and writes a short internal report with the basic information.
- The NIB's Board takes the decision to open an investigation with the elements provided by the investigators. The decision is based on the evidence and the classification and seriousness of the event, the consequences and organisational knowledge. Unless the occurrence is a serious accident (with immediate opening of investigation), the occurrence is referred to the next meeting of the board (it meets once a month), that will decide on the opening of the investigation. The decision can be delayed for several months, while the NIB tries to gather more information and clarifications.
- The NIB has no access to the database of occurrences of the NSA nor the database of the national infrastructure manager.
- The NIB receives a monthly "events summary report" from the main IM (Adif). The NIB receives a yearly report from the other IMs.
- The NIB announces the opening of an investigation on its website and by emails to the main stakeholders.

### **Evidence collection and analysis (600 series questions in questionnaire)**

- The NIB may arrive on site one or more days after the accident. The elapsed time from Madrid to the site, combined with the pressure to resume train operation, can sometimes result in the site having been altered when the investigators arrive.
- The NIB has developed a guidance for data collection. The extent of evidence collection on site is determined by the site investigation team based on their own experiences.
- The NIB has sometimes difficulties to organise and schedule interviews. The involved staff may refuse to talk with the NIB in case a Judicial Investigation is on-going. In order to create a good atmosphere the NIB will go to a place chosen by the interviewee. Most of the times it is at their workplace, although in some case they have chosen places «away from the office» to feel more free.
- In most cases the judicial authority has agreed to share evidence as useful as statements of involved staff or police reconstructions, and have collaborated with the NIB in reconstructions and tests. They are more reluctant to share things like data related to victims.
- The NIB does not have any guidelines nor procedures for dealing with the press.
- NIB has a range of investigation tools (causal tree, STEP, bowtie...) and special methodologies for Human Factors (acquired after training courses). In each case the investigators chose the method that best fits the necessities of the investigation.
- The NIB does not perform the measurements on-site itself.
- After the work on-site is completed, the NIB does not routinely share the collected evidence and documents with the judicial authority, unless requested.
- Every time a new investigation is opened, relevant organizations can “sign up” to be involved/informed via a web form including victims and relatives. The victims usually don’t, most probably because most of them don’t even know about the NIB.
- The NIB has some problem collecting the names of the victims and relatives. The RU usually has a list of victims and relatives and means to contact, but they are reluctant to share it because of data protection issues. The NIB has proposed to the RU to include a reference to the possible contact with the NIB in the “useful information” they give to the victims and relatives, but they have not answered to this proposal yet.

### **Report preparation and publication (700 series questions in questionnaire)**

- The NIB uses a report structure following the structure defined in the Regulation 2020/572.
- The Board reviews the draft report before the consultation of stakeholders and following the feedback of the consultation exercise.
- The NIB sends a draft report to the interested parties (stakeholders) allowing them to comment on the report.
- The draft report is available for consultation for 15 working days (3 working weeks).
- The NIB publishes the investigations reports on its website. Publication is notified (via e-mail) to relevant stakeholders involved in the investigation and an electronic and paper copies are sent to the NSA, the IM and the RU. Publication date is completely independent of judicial procedures. The summary, conclusions and recommendations are available in 2 languages (Spanish and English).
- The NIB includes a statement at the beginning of the report to try to prevent its publications from being used for purposes other than safety.
- The 2 reports proposed by the NIB include causal, contributing and systemics factors. The reports include a picture of the causal tree.
- The average time to publication is 19.3 months for 'mandatory' investigations. Several reasons for this average time have been identified by the NIB which for example include the delay in obtaining some information from the stakeholders, and the monthly meeting of the board to take some decisions, ...
- The annual reports are published on the NIB website by the required date. All the annual reports since the origin of the NIB (Decembre 2007) are available on the NIB website.

### **Handling safety recommendations (800 series questions in questionnaire)**

- The safety recommendations are part of the consultation process and are included in the draft report which is sent to all involved parties.
- The NIB addresses the recommendations to the NSA and mentions the end implementer.
- The NIB is informed by the NSA as a minimum annually, as stated in the RD623/2014 articles 15.6. This enhances the likely acceptance of the safety recommendations. There is a general update on the state of recommendations before every regular meeting NIB-NSA (twice a year).
- The NIB includes in its annual report a status of the implementation of the safety recommendations given by NSA.
- All the recommendations have received an answer, except some old recommendations addressed to other organisations or authorities that have remained without response nor measures.



### **Health & safety of investigators (900 series questions in questionnaire)**

- The Ministry for Transports has a Health and Safety Department that covers the NIB. It makes risk assessments for NIB employees, gives training when necessary and provides the NIB with the personal protection equipment that it needs.
- Investigators are provided with personal protective equipment as soon as they join the NIB: safety boots, waterproof boots, helmets, protective gloves and glasses, clothes for different conditions, masks...The investigators keep their personal equipment in the office and not at home.
- The Civil Aviation NIB has developed a specific training course about safety at the accident place and several Rail NIB investigators have attended that training. However, there is currently no specific training about safety at the site of a rail accident.
- The NIB has no Risk Assessment Document that covers the generic risks encountered on site (One is currently underway). The NIB can obtain advice from specialists from the railway organizations and emergency services present on site but the coordination and processes are done on site, quite informally.

**Actions taken by the NIB relevant to the Peer Review findings (if any).**

- The process of organization of the new multimodal NIB is underway. The CIAF will take into account all the findings of the Peer Review (specially suggestions for improve) to incorporate them.

**Panel comments on effectiveness**

- The NIB generally performs effectively.
- The NIB performs the work that is required by the national legislation.
- The NIB publishes the annual report in a timely manner before 30 September every year.
- The NIB draft recommendations objectively and clearly identifies the safety objective and the end-implementer. All safety recommendations have been accepted or are in progress.
- The NIB publishes good investigation reports which followed the European Regulation report structure.

**Panel comments on independence**

- The Panel considers that the Board / NIB appears to work independently, fulfilling the criteria in Directive (EU) 2016/798 of the European Parliament and of the Council of 11 May 2016 on railway safety (recast).
- The Panel observes that the Board is part of the NIB and the investigators are working for the Board.
- The Panel observes that the priority given to the Judicial Authorities can hamper direct access to some of the evidence. The NIB is at the mercy of the goodwill of the investigating judge.
- The Panel observes the prevalence given to the Judicial Authorities and the associated risk concerning the independence of the safety investigation performed by the NIB.
- The Panel observes that the NIB investigators appear not to have any legal protections and may be summoned to appear in court during the legal proceedings which could aim to allocate blame and responsibility.

### Identification of strengths

- The NIB has produced guidance on how to carry out investigations.
- The NIB actively participates in the NIB Network and associated task forces.
- The NIB publishes the status of the recommendations in the annual report.
- The NIB reports have a high technical content and follow the structure of the European Regulation.
- The NIB has put in place performance indicators included in the annual report.
- The NIB Team can receive the support of Board expertise. The existence and involvement of a board provides a uniform approach to the production of the investigation reports and recommendations, ensuring consistency in the output.
- The NIB is small organisation which works well as a team.

### Identification of areas where improvements are suggested

- The Panel encourages the Board / NIB to consider :
  - the need for investigators to go on site more often,
  - the risk of evidence loss because of the amount of time it takes to reach an accident site,
  - whether to develop an alternative means of collecting evidence on site.
- The Panel suggests that the Board / NIB should consider the need for a recurrent training process for investigators in order to maintain their competence.
- The Panel encourages the Board / NIB to try to overcome the difficulties it currently encounters when dealing with the victims and relatives in accordance with article 23(3) of the Directive.
- The Panel encourages the Board / NIB to consider what actions they could take in order to reduce the time to publication (getting closer to the deadline of 1 year after the accident).
- The Panel encourages the Board / NIB to consider the elements which could be shared with the Judicial Authorities (factual elements) and the elements not to share (analysis, interview,...) . The judicial and safety investigations need to remain independent from one another.

#### **Additional comments by the Panel (if any).**

- The Panel encourages the Board/NIB to engage with the Ministry to consider the predominance of the Judicial Authority on the NIB in the redaction of the new law ( *BOE-A-2024-15937 on the creation of Independent Administrative Authority for Technical Investigation of Railway, Maritime and Civil Aviation Accidents and Incidents*) and its effect on the independence of the NIB. For example:
  - Article 8 of the new law states that the exercise of the NIB powers may require prior approval by the judicial Authority where necessary.
  - Article 24 of the new law states that the NIB will share the evidence it holds with the judicial authority. There appears to be no exception to this (e.g.: even for witness statements which should normally be protected). Article 23 openly acknowledges that witness statements can be used in a judicial setting
  - Article 25 of the new law state that in the event that the judicial authority requests the participation of persons attached to the Authority, the provisions of Article 27.2 of this law shall apply. There appears that investigators can be part of a judicial investigation as expert.
  - ...
- The Panel would like to thank and show its appreciation to the NIB for volunteering to be peer-reviewed and for the openness and courtesy with which it was received.

## **PART 4 – COMMENTS FROM NIB**

#### **Comments by the NIB (if any).**

Although with the creation of the new Multimodal Authority the results of this peer review could be considered “obsolete”, this review can be especially useful to certify the functioning of the Spanish NIB so far, to identify current needs and points of improvement that can be solved with the new Authority, and to serve as a reference to assess in the future the performance of the new Multimodal Authority. For this reason, we consider this review to be particularly useful, even beyond its initial purpose. The Spanish NIB thanks the Peer Review team for their work and willingness.