

Document Review – Comment Sheet

Document commented: Common Safety Methods on the assessment of Safety Level and Safety Performance of railway operators at national and Union level (CSM ASLP)

<i>Requestor:</i>	Consultation.ERA1219@era.europa.eu
<i>Deadline for submitting comments:</i>	17 March 2021

	<i>Reviewer 1</i>	<i>Reviewer 2</i>	<i>Reviewer 3</i>	<i>Reviewer 4</i>	<i>Reviewer 5</i>
<i>Date:</i>	09/03/2021				
<i>Name:</i>	Pedro Carreira				
<i>Organisation:</i>	CP – Comboios de Portugal EPE				
<i>Email:</i>	pdcarreira@cp.pt				

Document History

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1	09/03/2021	Although we understand the benefits underlying the MCS ASLP, such as the knowledge about the reality of RU and IM, and the uniformity of the registration and treatment of occurrences, seems that the method presented is difficult to implement.

		<p>The three types of occurrences refer to a very high number of occurrences to be reported, each one with different fields. Therefore, it may be necessary to change work processes and methods with a greater workload.</p> <p>In addition, these occurrences will be transmitted into a online platform for reporting information. Since RU have their own incident reporting systems, it would be easier and more practical to obtain this information directly from those systems without having to repeat the work of reporting and filtering information.</p> <p>Besides the reporting of the various types of occurrences, we also have to report Risk Control Measures (implemented, which worked and did not work), as well as buildings blocks, which implies a interconnection between all of these categories of occurrences and RCM. For each RCM, a lot of information has yet to be transmitted.</p> <p>This phase will undoubtedly entail a significant change in RU’s working processes.</p> <p>In addition, the platform is not yet developed, and only after its development can we make a more appropriate analysis and even understand the time needed and training’s staff.</p> <p>Comparing safety performance between pairs should include adjustment factors, although indicators are train-kilometer weighted. The reality of countries and RU is quite different and therefore not comparable, without incorporating socio-economic factors that retract the reality of each country.</p>
0.2		
0.3		

Conventions:

<i>Type of Comment</i>		<i>Reply by requestor</i>	
G	General	R	Rejected
M	Mistake	A	Accepted
U	Understanding	D	Discussion necessary
P	Proposal	NWC	Noted without need to change

Review Comments <if necessary add extra lines in the table>

<i>N°</i>	<i>Reference (e.g. Art, §)</i>	<i>Type</i>	<i>Reviewer</i>	<i>Reviewer's Comments, Questions, Proposals</i>	<i>Reply</i>	<i>Proposal for the correction or justification for the rejection</i>
1.				Although we understand the benefits underlying the MCS ASLP, such as the knowledge about the reality of RU and IM, and the uniformity of the registration and treatment of occurrences, seems that the method presented is difficult to implement.	NWC	The implementation of the CSM will be supported with guideline and with the ISS.
2.				The three types of occurrences refer to a very high number of occurrences to be reported, each one with different fields. Therefore, it may be necessary to change work processes and methods with a greater workload.	NWC	The taxonomy covers a more detailed description but it does not contain much more event types. This will be easily identifiable with the ISS that will allow to report the level of information available on each occurrence, while applying the structured taxonomy. The three category of events are necessary to better analyse causes of occurrence in a structured manner. This is also supporting the implementation of the CSM on SMS as it requires a systematic investigation of accidents and incidents to determine their causes is a requirement for operators as part of their SMS - CSM SMS, Annex I/II, Art. 7.1.1 (a)
3.				In addition, these occurrences will be transmitted into a online platform for reporting information. Since RU have their own incident reporting systems, it would be easier and more practical to obtain this information directly from those systems without having to repeat the work of reporting and filtering information.	NWC	The CSM will allow machine to machine reporting directly to the ISS, as indicated in its Article 7.4

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4				<p>Besides the reporting of the various types of occurrences, we also have to report Risk Control Measures (implemented, which worked and did not work), as well as buildings blocks, which implies a interconnection between all of these categories of occurrences and RCM. For each RCM, a lot of information has yet to be transmitted.</p> <p>This phase will undoubtedly entail a significant change in RU's working processes.</p>	NWC	<p>The biggest change will be to report information in an harmonised manner. It will allow improved collective learning between operators, and also at national and EU level, as the information will be understandable by every actor.</p> <p>It also helps to implement the CSM on SMS in a structured manner, allowing better exchanges with authorities in accordance with the CSM on supervision.</p>
5				<p>In addition, the platform is not yet developed, and only after its development can we make a more appropriate analysis and even understand the time needed and training's staff.</p>	NWC	<p>The GoA will be involved in the description of the ISS and guidance material, which should allow to limit to the minimum the needed adaptation effort.</p>
6				<p>Comparing safety performance between pairs should include adjustment factors, although indicators are train-kilometer weighted. The reality of countries and RU is quite different and therefore not comparable, without incorporating socio-economic factors that retract the reality of each country.</p>	NWC	<p>A certain level of comparison will be allowed, even if we can agree that no operator is strictly the same as another.</p> <p>As any indicators, the uncertainties relating to the assessments will be considered as it is indicated in the CSM proposal in order to deliver robust assessments, taking into account those uncertainties.</p>

Note: This table could be changed according to the requestor's needs

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