

Making the railway system
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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)

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<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>	17-03-2021	17-03-2021			
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Document History

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1		
0.2		
0.3		

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Conventions:

<i>Type of Comment</i>		<i>Reply by requestor</i>	
<i>G</i>	General	<i>R</i>	Rejected
<i>M</i>	Mistake	<i>A</i>	Accepted
<i>U</i>	Understanding	<i>D</i>	Discussion necessary
<i>P</i>	Proposal	<i>NWC</i>	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.	Art.2 scope	G/P	1	Add one article, easy to read for (small freight-) operators, that summarises all the requirements to be fulfilled by an RU.	A	The Article 4 has been redrafted containing all the requirements in a straight forward manner.
2.	Art.6 collective learning	U	1	When will the TOR (Terms Of Reference) of the group of analysts be available?	NWC	The work on the Working Arrangements has started. It is planned to have these Working Arrangements finished by September 2021. A first draft version has been published on extranet on 19/04/2021 for discussion with the working party members.

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4	Art.7 Information sharing system	U	1	Is a there a role foreseen for NSA's to validate certain data brought in by the operators or a role to bring in data themselves?	NWC	Yes the two possibilities are offered. NSAs can request a review of data provided by operators in accordance with Article 4. NSAs can voluntary report data and information on an occurrence as any other party in accordance with Article 2.
5	Art.7	U	1	What is the difference or connexion with the CSI data set?	NWC	The CSI dataset is a subgroup composed of events of Cat A (mainly) and few events of Cat B. This is due to the fact that CSI are mixing actual accidents and some precursors to accidents.

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6	Art.7	U	1	Add a clear statement about data ownership. Who is the owner of the data provided by the RU's, and what rights do the NSA's have regarding the data?	NWC	<p>The CSM does not need to define ownership but only the rules to collect, share and use the information in accordance with the Mandate and applicable EU legislation on the protection of data.</p> <p>Each entity reporting data in the ISS is responsible for the information reported and accepts to share the information in accordance with the sharing rules established by the CSM.</p> <p>The NSAs are entitled to use the data in accordance with CSM article 7, within the limits of their role and competence.</p>

7	Art.2	G	2	<p>The purpose of these common safety methods is threefold at the level of RU/IM, NSA, and ERA:</p> <p>a. RU/IM: to support and improve the railway undertakings and infrastructure managers in their safety management (3)</p> <p>b. NSA: to support decision making of Member States regarding the achievement of common safety targets (3)</p> <p>c. ERA: to strengthen the information on the occurrence of accidents and incidents, their causes, their outcomes and risk control measures, in order to improve risk-based decision-making (9)</p> <p>In order to achieve these targets it is important to ensure the comparability of railway (safety) data between RU's/IM's/NSA's as well as the historic backward compatibility within RU's/IM's/NSA's. Although, the taxonomy sketched in the appendix of this draft is a good start, it is at this moment insufficient; both in its definitions (mainly lacking) and in its coverage. An ontology and a data scheme that identifies the relations between the entities like in a semantic web, would not only make the definitions more explicit. It would also warrant the interoperability of the collected safety data. But perhaps a test scenario could be the judge and also reveal in what ways this taxonomy should be expanded, maintained and developed further. Several Member States have already developed occurrence reporting systems at national level. The maturity of this taxonomy and its shortcomings can be identified by building an interface to a common information system managed by the Agency. As the interface would critically depend on this taxonomy. It could be tested further by uploading historic data of these NSA's, making use of this interface. Apart from a test scenario for the taxonomy, the uploaded historic data would also provide the requisite training dataset for the development of machine-learning based risk models. The completeness and usability of this taxonomy for all Member States is an important step to take first, before adopting Article 4 of this CSM at all.</p>	NWC	<p>The philosophy adopted by the CSM is that the taxonomy and the entire CSM is updated in accordance with the needs to correctly cover the description of accidents and incidents and causes, for an adaptable and flexible railway system.</p> <p>The first version of the taxonomy is mature and derived from many previous EU level research and projects.</p> <p>It ensures backward compatibility with the taxonomy introduced by the RSD. This can however not be guaranteed with reporting systems existing at national level.</p> <p>On this basis, the implementation of the CSM can start and corrective actions can be proposed by the Group of Analyst as far as necessary, taking into account lessons learnt.</p> <p>The Agency is also considering adding a semantic layer in the framework of digitalisation programmes of the EU on which future adaptations of the CSM can be based.</p>
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