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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>	14 March 2021				
<i>Name:</i>	Damien Pallant (DP)				
<i>Organisation:</i>	SNCF Voyageurs				
<i>Email:</i>					

### *Document History*

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1	14 March 2021	
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.	Article 1 and 5	G	DP	<p>As stated by article 1, the goal of this proposed CSM is to assess the safety level and the safety performance of railway operators at national and Union level.</p> <p>However, article 5 describes this assessment process as built upon the consolidated assessments of individual RUs. This process should not in any case result in an inappropriate rating of railway operators. This could lead to opposite results than the expected ones in safety improvement.</p>	NWC	<p>Noted. We have discussed examples with the working party of two well experienced methods in railway that would allow to assess operators in an appropriate manner.</p> <p>The assessment will be exercised with a transparent method taking into account uncertainties and will be fair.</p>

2.	Annex III	G	DP	<p>Very ambitious proposal for occurrence scenarios and risk control measures. Seems too far ahead according to industry maturity.</p> <p>First : As a comparison a look of what has been implemented by EASA is a good approach. Aeronautical industry is used by years to collecting data on a European (and even a worldwide) basis. It started with simple occurrence reporting. Then they implemented work on Risk Management with the ARMS Working Group (Aviation Risk Management Solutions). They work on Event Risk Classification. This process eventually ended in developing the ECCAIRS2 data set. A global overview of this dataset can be achieved by having a look at the following link : <a href="https://e2.aviationreporting.eu/taxonomy">https://e2.aviationreporting.eu/taxonomy</a></p> <p>Second : For RU having starting work on other risk modelling like bowtie having such a reporting means additional work and huge IT work to implement gateways between databases.</p> <p>Third : despite changes introduced targeting to make railway industry more interoperable there is still lots of differences in between operational contexts in Europe. There will be mostly no connections in between occurrence scenarios and risk control measures</p>	NWC	<p>The knowledge of occurrence scenarios and causes of events is a requirement that is existing in the railway legislation and for railway operators in the CSM SMS Annex I/II, Art. 7.1.1 (a).</p> <p>The CSM ASLP is mainly proposing a structured approach for the collection of this information for supporting collective learning.</p> <p>The ISS will support the proposed structured reporting to facilitate its implementation.</p> <p>Of course a learning curve is expected for the sector to fully implement the proposed approach.</p> <p>The CSM ASLP follows a similar approach than the one established for aviation. The potential use of ECCAIRS2 as a basis for the CSM ASLP Information Sharing System is under consideration.</p> <p>The ISS will be supportive to the implementation of the scenarios reporting.</p> <p>The method proposed allows to respect these differences while introducing a possibility for sharing relevant information.</p>
3.	Annex IV	G	DP	The way the safety level is assessed in this proposal is a very reactive one. A simple way to	NWC	The CSM ASLP is proposing two methods 1) SL assessment based on the occurrence of events (reactive) and 2) SP

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				<p>introduce the complexity of such an assessment is to answer the following question : considering two different RU having the same number of events related to the same volume of operations, will they report the same number of events if one has a poor level of safety culture and the other a very high level ? Comparing only reported events can be like just comparing apples and carrots. Just remind that aviation industry tried years ago to implement a “black list” of airlines. They first tried to assess the safety level according to occurrence reported. They quickly changed and assessment has been made following inspections and review of events analysis.</p>		<p>assessment based on the maturity of the operator to control its risks (proactive).</p> <p>Then you may also consider that SL is not only based reporting numbers but also the type of events occurred. Then the two operators you mention may have occurrence for different type of event and then target their prevention effort in the appropriate manner.</p> <p>We consider that the CSM ASLP will have a positive impact on the quality of the reporting, and in turn non-discriminating assessments.</p> <p>The CSM ASLP will not publish any black list, but will share the information with the NSA who shall supervise each operator.</p>

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4.	Annex V	G	DP	Safety performance assessments are very useful tools to improve safety. However only relative comparison between to time periods for a RU are relevant for a good assessment of safety level. Following the same principle than the one advocated in the previous remark they are huge differences in evaluations between RU according to their level of safety culture maturity. Ones with poor safety culture may have a tendency to overestimate their level. On the opposite ones with high safety culture may have a tendency to underestimate their safety performance.	NWC	On the principle we can propose the same answer as in the previous comment. It applies also to the Safety Performance assessment.  SP assessment allows for qualitative insight on the control of risks that can be used by the NSA in its supervision role.  The NSA will have the possibility to check over or underestimations and may request a review if needed.
5.	Annex VII	G	DP	This annex states that the Group of Analysts “shall elaborate and maintain its work plan, including the definition of an harmonised risk classification and decision-making method (analysis function)”. This sounds strange after reading of Annex III.  Before requesting data on occurrence scenarios from stakeholders risk model must be defined.	NWC	On the contrary, we think that the reporting of scenario shall be factual and independent from anticipated potential decision resulting from a decision making method.  Therefore we expect no issue for the future definition of the analysis function.  We feel a bit inconsistent the fact that you ask for an harmonised risk model while in comment 2 (second) you indicate that risk model is specific to each operator.  The reporting of scenarios is a different exercise than risk modelling.

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6.	Impact analysis	G	DP	Associated costs seems to be underestimated for the RU. Years ago we experienced such a connection in between our safety databases and SCOTES (safety database of EPSF, French NSA). The amount of transferred data was far less reduced than the one expected in the CSM ASLP and the associated costs were quite huge. Just remind that according to the impact analysis "importance is given to the work of the CSM ASLP WP emphasizing the issues of minimizing / reducing administrative burden". Start simple.	NWC	<p>The cost are correctly estimated.</p> <p>The ISS will use up-to-date and open source technologies.</p> <p>The CSM ASLP will allow to connect pre-existing systems to the ISS (direct channel) or to use indirect channel, allowing flexible reporting methods.</p> <p>The Common Digital Interface will be defined taking into account operators and NSAs existing systems to minimise the connection costs.</p> <p>The phased approach builds on starting with a very limited reporting scope and then enlarge beyond the transition period. Moreover, any future adjustment of the CSM ASLP is tightly controlled with recommendation and impact assessment.</p>

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7.	Impact analysis	G	DP	Today French RU are requested by EPSF to report their events in a dedicated database (SCOTES). Once again as stated by the impact analysis "importance is given emphasizing the issues of reducing double reporting". Having a double reporting with SCOTES and the ASLP database is a very complex and expensive process. This definitely must be avoided.	NWC	<p>There is no double reporting. The operator will report once and the ISS will ensure the sharing of information with the NSAs either using the direct or the indirect channel.</p> <p>As indicated in the previous comment, operators may still report to the ISS through the NSA system. This is still allowed by the CSM ASLP (indirect channel reporting) and you may continue to report to the NSA.</p> <p>In this case, your reports will actually be forwarded without amendment to the ISS by the NSA system, on behalf the operator.</p> <p>The integrity of the information between the operator and the ISS will be ensured by the NSA connected system and the ISS common digital interface IT specification. (data integrity)</p>

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

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