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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)

<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>	10/03/2021	10/03/2021			
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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.	Article 7	P	Reviewer 1 & 2	In order to develop IT systems by RUs, it would be interesting to be able to access good practices developed by the sector (IT developments by RUs, commercial software, etc.). Being this new legislation, a novelty for the sector, it seems convenient to have this common knowledge to start the developments.	A	The Agency has investigated practices in Maritime and Aviation sector and developments made by the related EU Agencies. ERA is also currently processing IT development project that gives us a very good view of the current operators and authorities situation.
2.	Article 9	P	Reviewer 1 & 2	The taxonomy of risk control measures should be developed in the near future so that IT developments are not affected by future changes, etc.	A	This is already started by the Group of Analysts Subgroup A

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3.	Article 9	P	Reviewer 1 & 2	For the purposes of self-evaluation by the RUs, it would be advisable to know what good practices are implemented in the sector, in order to be able to self-evaluate in comparison. A knowledge of the implemented good practices can help to make see the needs in companies and current the state of the art.	NWC	This is the objective of the Group of Analysts to extract good practice from the information shared by operators with the ISS. Guidance and supporting materials will be made available also.
4.	Article 11	P	Reviewer 1 & 2	The implementation deadlines must be reasonable and coordinated. It must be ensured that IT developments (which will be expensive) are made on solid foundations. Therefore, having a global photo or good practices already applied can help its implementation in companies that have not yet developed it.	A	The Articles 2, 4 and 11 have been re-drafted to make very clear the scope, deadlines and implementation phases for the operators and authorities.
5.	Annex I. part B	P	Reviewer 1 & 2	The concepts "Technical failures" and "operational failures" must be clearly defined.	NWC	This can be explained in guidance.
6.	Annex III . 3.2.1	P	Reviewer 1 & 2	The distinction between 'Risk control measure' versus 'Management of a Risk control measure' is not very clear.	NWC	We agree, however explanations have been removed from the legal text because it will be further used and develop to elaborate detailed guidance with examples. Only the requirements stay in the CSM text.

<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>
7.	APPENDIX A – PART	P	Reviewer 1 & 2	The "Taxonomy of types of risk control measures" should be developed in a short period, so that it does not impact on the IT developments that are made. If an EF develops its own taxonomy and in the future it must adapt to that of the CSM, it can be difficult, especially for migration from one to another.	A	This work is already started by the GoA subgroup A and will be made available before the CSM implementation is started. The Agency will issue a Technical Opinion on this topic

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

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