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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)

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

	Reviewer 1	Reviewer 2	Reviewer 3	Reviewer 4	Reviewer 5
Date:	15.3.2021				
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## **Document History**

Version	Date	Comments
0.1		
0.2		
0.3		

## Conventions:

	Type of Comment	Reply by requestor		
G	General	R	Rejected	
M	Mistake	Α	Accepted	
U	Understanding	D	Discussion necessary	
Р	Proposal	NWC	Noted without need to change	

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

N	Reference (e.g. Art, §)	Туре	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
1.	APPENDIX A – PART A Taxonomy of event types, Category A events, page 74			"RSD AppAnnexI." What does this refer to? We did not find any AppAnnexes from the Directive on railway safety (2016/798).		Reference is clarified in the final text.  This is a reference to the appendices of the Railway Safety Directive (EU 2016/798), more specifically to Annex I of this directive. In Annex I the Common safety indicators (CSI) to be reported by the national safety authorities are described. Wherever the reference "RSD AppAnnexI" appears in Appendix A of the CSM ASLP, it is meant that the same event definition applies as for reporting on CSIs.

P O	APPENDIX A — PART A Taxonomy of event types, Category A events, page 74	P	A6.2 Electrocution could be deviated to 2 points: Electrocution from track infrastructure and	Your input will be discussed by the Group of Analysts (GoA)
			Electrocution from rolling stock. If electrocution happens from rolling stock, there is always something wrong either in equipment or in the way it is operated and/or maintained.	in the process of the Taxonomy improvement integrated in the CSM.  1. See answer to comment N° 1. A choice has been made to maintain alignment with the current legal framework in terms of reporting on CSIs. But this can be improved wit time.
				<ol> <li>For specific types of events, operators will be asked to report on the entire occurrence scenario. In that case more information on the potential sources of the type A event can be reported on using the type B and C event types + contributing factors.</li> <li>In case, it would appear necessary, The GoA can propose a change to the Taxonomy which can be implemented has part of the CSM ASLP continuous improvement process</li> </ol>

N°	Reference (e.g. Art, §)	Туре	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
3.	APPENDIX A – PART A Taxonomy of event types, Category B events, page 77	U/P		B.1.1.2 On track plant incorrectly outside possession — Does this mean: "Track maintenance equipment exceeding work area/moving outside work area."		Yes, indeed. It is meant that a unit is allocated the task of conducting maintenance. For this task it is allocates a precise zone which perimeter may not be crossed. In case the perimeter is crossed without specific authorisation this type B event would apply.
					D	It is the intention to provide clear definitions for event types not yet defined elsewhere in the legal framework, in column 3 of the tables describing the event types. This input will be taken into account as input for the work by GoA Sub group A to continuously improve the taxonomy.
4.	APPENDIX A – PART A Taxonomy of event types, Category B events, page 77	P		B.1.1.3 Pushed switch. Would the term "Forcing open the points" be better (or "Forcing points open" or "Switch run open/against direction")?	D	It is the intention to provide clear definitions for event types not yet defined elsewhere in the legal framework, in column 3 of the tables describing the event types. This input will be taken into account as input for the work by GoA Sub group A to continuously improve the taxonomy.
5.	APPENDIX A — PART A Taxonomy of event types, Category B events, B.2.1 Failure of the wheelset, page 78	P		Can also "Wheel flat" be one failure type or mentioned in B.2.1.1?	D	It seems that it is not the case if we refer to the definition of the CSI "Broken wheel on rolling stock in service", however it could also be understood like this.  As indicated in comment 2 the taxonomy can be improved to clarify this point further with the GoA.

N°	Reference (e.g. Art, §)	Туре	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
6.	APPENDIX A – PART A Taxonomy of event types, Category B events, page 79			B.2.3.3 Traction motor failure (electrical). It could be more beneficial to use "Traction equipment failure." This way all components in traction chain, like transformer and converter failures, could be reported.		It is the intention to provide clear definitions for event types not yet defined elsewhere in the legal framework, in column 3 of the tables describing the event types. This input will be taken into account as input for the work by GoA Sub group A to continuously improve the taxonomy.

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

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