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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>	17.03.2021				
<i>Name:</i>	Andre Zahharov				
<i>Organisation:</i>	AS Operail				
<i>Email:</i>					

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 7, point 7	G	Andre Zahharov	Will there be possibility for the operators to develop link to their current information system in order to export data to the ISS? Or is it expected that any connections to other systems are done exclusively by the ERA?	NWC	Yes, the Information Sharing System will allow machine to machine connections with operators systems
2.	Annex I – General Part, 1.4 (b)	U	Andre Zahharov	Is it possible to provide further details/explanations with regard to circumstances when SOR will be required?	NWC	This is not used in the first CSM version (reserved). It will be used in the case the Group of Analyst would justify that there is a need to collect a specifically targeted information with simple reporting of targeted event types. This is conditioned to learning potential and cost-effectiveness.

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3.	Annex I – General Part, 3.1.2	U	Andre Zahharov	Further detail/explanations required to understand how to determine if an occurrence is Dangerous Goods related or not.	NWC	This is defined by RID 1.8.5. provision (Directive 2008/68). It does not need to be explained in the CSM text. The CSM does not change RID requirements and is consistent with it.
4.	Annex I – General Part, 3.2.2	U	Andre Zahharov	Further detail/explanations required to understand how only SR is used for the estimation of safety level for each railway operator. This seems a very general and unprecise estimation. Or is there a misunderstanding from my side regarding meaning of safety level. What is safety level in this case?	NWC	The Group of Analyst is tasked by the CSM to develop the details of the SL estimation, in accordance with the CSM annexes IV. It will be added in a revised CSM version. The detailed description with use well experience approaches that have been used by some WP members. As indicated in the CSM definition the safety level is actually reflecting the risk posed by the operators' operations. It will also be accompanied by Guidance.
5.	Annex I – General Part, 5.1.2.1.	U	Andre Zahharov	Why are some data items asked several times when they are already provided under 5.1.2. (same for 5.1.2.2)? For example reporting entity identifier, reporting entity category, reporting person identifier.	NWC	It is not asked several times. The Information Sharing System will make it easy to use the datasets.
6.	Annex I – General Part, 5.1.2.1. page 17	U	Andre Zahharov	What is meant under CARGO_NUMBER and CARGO_SPEED(km/h)?	NWC	(Cargo is the payload carried on wagons) This is used when an occurrence is for example a cargo falling from the wagon or is displaced, and then collide with another object.

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7.	Annex I – General Part, 5.1.2.1. page 22	U	Andre Zahharov	What is meant under EMU and DMU?	NWC	Electrical Multiple Unit train Diesel Multiple Unit train https://en.wikipedia.org/wiki/Multiple_unit
8.	Annex I – General Part, 7.1.2.	U	Andre Zahharov	IM is infrastructure manager and RU is railway undertaking?	NWC	Yes
9.	Annex I – General Part, 7.3.1.	U	Andre Zahharov	What does validation mean in <i>end of validation period</i> ?	NWC	This is the action of the operator to declare valid their datasets that are used for their assessment
10.	ANNEX I – Part A	U	Andre Zahharov	Under applicable sharing requests, is it expected four separate (also regarding time) reports or one report with four sections?	NWC	The reporting is clarified with the re-drafted Article 4 and the sharing request covered by this article have been removed from the final draft.
11.	ANNEX II, 1.4, page 33	U	Andre Zahharov	What is the minimum maturity level? Is it level 1 as described later in the document (APPENDIX B, Article 4, point 1. Page 99)?	NWC	As explained, for level 1: “no requirements are established for this level. It is the level allocated in case the railway operator is not able to provide the required evidences for demonstrating the achievement of level 2.”
12.	ANNEX II, 2.5 (b), page 34	U	Andre Zahharov	How to understand timeframe of <i>immediately on request</i> ?	NWC	Immediately means as soon as a request is done.
13.	ANNEX II, 3.4, page 34	U	Andre Zahharov	Under self-estimation. What are areas P, D, C and A and also the elements under each of these?	A	Dataset to be reported clarified in Annex II with reference to Appendix B.

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14.	APPENDIX A – PART A, PAGE 82	U	Andre Zahharov	How to understand Category C events? Unclear on most of the event types (for example C.1.1.2). Some examples on what is being meant behind these type of events would be beneficial.	NWC	Guidance and training will be provided on how to understand and use the taxonomy. Examples will be provided too.
15.	APPENDIX B, Article 5, 1.2. Page 100	U	Andre Zahharov	What is meant under required elements of proof for level 2, <i>origin of the hazards</i> ?	NWC	This means the source of the hazard
16.	APPENDIX B, Article 5	U	Andre Zahharov	Request to add examples for all maturity levels requirements	NWC	Noted, this will be taken into account while developing the supportive documentation.

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

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