EUROPEAN UNION AGENCY FOR RAILWAYS

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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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Deadline for submitting comments:	17 March 2021

	Reviewer 1	*Reviewer 2*	*Reviewer 3*	*Reviewer 4*	*Reviewer 5*
Date:	08/03/2021	10/03/2021			
Name:					
Organisation:	Renfe	Renfe			
Email:					

Document History

Version	*Date*	*Comments*
0.1	08/03/2021	
0.2	10/03/2021	
0.3		

Conventions:

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

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

N°	*Reference (e.g. Art, §)*	*Type*	*Reviewer*	*Reviewer's Comments, Questions, Proposals*	*Reply*	*Proposal for the correction or justification for the rejection*
1.	Whereas:	G		The cost-benefit chart of the current CSM-ASLP method does not reflect the real level of the economic impact on operators, since the said economic impact will be proportional to the size of each company and, on the other hand, we do not know the complexity of each organizational structure and the changes they will have to make to comply with the implementation of this method.	NWC	The IA is considering small, medium and big companies. The WP members have been consulted on the estimated impact costs and the IA is in general quite conservative (is taking reasonably high costs). Costs considered are only those that originates from the CSM ASLP requirements (see discussion in the IA report about the already existing obligations in EU legislation). These existing obligations should not be part of the costing for the CSM ASLP. The IA is positive in terms of the identified preferred option.

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2.	Whereas: (4)	G		A final impact analysis should be made of how the implementation of this draft CSM ASLP could interfere or overlap with the processes implemented by the railway sector of the previous MCSs.	NWC	As explained at the working party meeting the CSM ASLP does not overlap and is consistent with other CSMs which continue to fully apply. The CSM ASLP is providing harmonised support and sharing mechanism to already existing requirements established by the other CSMs. Further IA is foreseen in the future for proposals amending the CSM ASLP
3.	Whereas: (6)	G		We are concerned that the method fails to describe the level of detail that is required to share data and information in order to improve the level of learning between operators, we believe that it will not be possible to achieve this either if the method is not improved.	NWC	The CSM ASLP is providing all the processes needed for starting collective learning within and between every actor's layers (operator/National/EU). This is supported by the establishment of the GoA and the possibility to amend the CSM itself in accordance with lessons learned. The CSM does not prevent operators to shared harmonised outputs between them and to propose improvement sof the CSM for their need, through the GoA.
4.	Article 7 4.	G		Despite defining the ISS requirements, we express our concern about how the different information systems will be integrated both nationally and abroad between member states. The lack of interoperability of the systems will remain, although the technical problems have been resolved, due to the lack of consensus and interpretation of the information of the main actors.	NWC	The interoperability of the ISS with third party systems will take place through the ISS and its common digital interface (Indirect channel). Alternatively party can directly use the ISS (Direct channel) and share information through it.

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5.	ANNEX I – GENERAL PART 1. 1.2	P		Being aware that one of the parties cannot impose a single taxonomy and given that the current deliverables do not present a consolidated taxonomy, due to the lack of definitions and the need to establish new events, the starting point should be the Taxonomies proposed by the different NSAs, in our case, the NSA taxonomy proposal was prepared by a mirror working group that has had the participation of national operators.	R	The CSM taxonomy is based on previous EU harmonisation projects and it has been reviewed by the working party members who finally did not make much comment for changing it. The CSM must start with a harmonised taxonomy baseline and it can be improved with the learning and participation of GoA members.
6.	ANNEX III	P		We do not agree with including in the legal text (Annex III) the method to collect the data and information of the event scenarios, because it does not describe in detail how to apply the method, for example, it does not take into account the time differences of the events in the same input, the sequence in the diagrams must be according to the real processes, deductively and not inductively, such as the accident / incident investigation process. Therefore, a validation of the proposed method is required.	R	The method proposed was tested by the Agency on many occurrences described in NIB reports. The method is also consistent with relevant standards (IEC 62740), Regulation (EU) 2020/573 and other CSMs. Guidelines will be provided to assist the implementation and to allow the GoA to implement amendments, if necessary, with the revision process established also in the CSM ASLP. This is in fact an embed learning and validation process starting from the proposed Annex III baseline.
7.	ANNEX III – GENERAL PART	P		The graphical interface must be a requirement within the technical specifications of the ISS. Furthermore, this graphical interface must be an independent tool that can be integrated into any external system that belongs to the operators (without the need to use the ISS itself).	NWC	As explained during the WP meetings, the Agency is noting the graphical interface as a Business Requirement for the future ISS.

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8.	ANNEX III – PART B	P		Regarding the information that must be completed on each risk control measure, the use of free text for its description should be avoided, due to the difficulties that its analysis and learning may generate, it is necessary to notify said information according to a predefined structure.	NWC	The WP subgroup A is currently working on an improved taxonomy that may lead to a more structured categorisation of the information. However, many member feel that the RCM are very specific to their business, therefore it is necessary to allow for unstructured reporting of information as well, with free texts. Again the revision process of the CSM will allow to progressively improve the baseline proposed, taking into account lessons learned.
9.	ANNEX IV	P		It is proposed that the safety level should be disaggregated by types of events normalized to the best parameter that corresponds to it, obtaining more specific and appropriate initial values for each of the types of events, then an aggregation rule should be generated, by making a comparison (not summative) with respect to the known thresholds, which allows a classification according to the safety level, finally, by grouping, a single safety level value can be obtained as an indicator (SL). This method was proposed in the CSM ASLP working group.	NWC	Thank you for this comment. The formula in Annex IV allows Sub-Group C to explore the proposal by the reviewer. The need for and desirability of an aggregation to one single safety level value for an operator (across all types of events) can be discussed.

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10.	ANNEX VI – PART D	G		The implementation of this MCS-ASLP implies having to update the accident / incident investigation process as the Operators have it implemented by their SMS. Also, the new definitions of events that are proposed will interfere or break the historical data records that Operators have been maintaining, influencing the traceability of safety indicators.	NWC	The CSM is establishing a level of harmonisation which is fully consistent with CSIs and no break in historical values is expected in this area.

In addition to those values, it brings a higher level of detail that is also probably covered by some operators monitoring, but not by all operators who are limiting themselves to CSI reporting.

The CSM does not prevent operators to continue to monitor other event types in addition to the CSIs and in addition to the proposed taxonomy for their own business needs. The CSM also allows to propose new event types in the taxonomy or equivalence with terms used by operators, for discussion at the GoA, and possible taxonomy improvements. |

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

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