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	Reviewer 6
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Document History

Version	Date	Comments
1.0	16.03.2021	Final UIC comments

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	Entire Document	G	UIC	As you are aware, it is in the DNA of UIC, to develop harmonised and compatible measures within the different regions of the world, to ensure the high level of safety from railways, combined with constantly improving flexibility and competitiveness.		
				Thus, UIC is facilitating exchange of informations, lessons learnt between regions and stakeholders, since decades.		
				So far, the International Union of Railways (UIC) is managing the UIC Safety Database, capturing the major of significant railway accidents and Occupational Health and Safety indicators, that occur in Europe and out of Europe since 2006, on behalf of its members. It has been offering the opportunity of a cross-criteria quantitative analysis, time-series and trends of indicators, a focus on causes and consequences and benchmarking between IMs as well as a mapping of occurrences.		
				In that sense, UIC agrees on the main topics that have been brought in the position paper from CER/EIM, on 5th February 2021, related with the necessary phased application regarding: ○ *the taxonomies development related with "occurrence scenario's" and "risk control measures",* ○ *the rules to be developed with shared data and learning potential for "GoA" and individual operators,* ○ *the development of functionalities, and availability of (temporary and final) IT solution and interfaces* ○ *the balance in costs and benefits for operators (time consuming, data transfer process, etc.) and the necessary step by step approach.*	NWC	The comments reported by CER and EIM have received an answer published on the Agency website. We would like to thank you for your contribution to the elaboration of these comments and would suggest to review the answers from the Agency on our website.

						NWC	

Nevertheless, thanks to the practical experience of UIC in developing his activities related with the Safety Platform activities, UIC suggests to consider his added value and recommandations for the future activities that will develop the practical fundations of CSM ASLP, especially on :

NWC

- o *the centralized process for monitoring and supervision of that CSM workstreams ("GoA steering group"), especially the interfaces with matters on TDG, SAIT, JNS UP and NP, and the development of "AMoCs", as future "risk control measures" and shared knowledge*

NWC

- o *the potential link with the actual UIC safety database, as without historical data, no analysis can be made. This must be foreseen so that time series are consistent enough from start.*

NWC

- o *The adequacy/consistency between European and Worldwide activities on these Safety matters.*

NWC

Nota-Bene: the actual organisation of the UIC Safety Platform activities are described below:

- ➢ *SPG - Safety Performance Group: on that matter, a safety report is published every year, since 2007, thanks to the UIC Safety database related with significant accidents.*
- ➢ *IRSN - International Railway Safety Network: this is the informal group for exchange of best safety practices*

The call for the GoA membership will be open to experts representing the representative bodies. UIC's experts may join the GoA when the call will be published.

We welcome the proposal from the UIC to share historical information through its future participation to the GoA.

We agree that further harmonisation work may be needed between the future regulation taxonomy and the one used on national and international bases. The future GoA is also tasked to work on this type of activities.

UIC's experts may contribute to the future GoA is various technical topics according to the needs.

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				and lessons learnt, in between Safety Directors/Managers of UIC Members. ➤ *UIC/CER SSMG - Safety System Management Group: mainly, the activities linked with the 4th railway package activities + activities linked with JNS procedures, SAIT, are combined with CER, and where applicable with EIM, UIP.* ➤ *OHSG - Occupational Health and Safety Group, where an annual safety report is produced, and some guidances are produced, related with–the health and safety of the railway workforce.* ➤ *HOFWG - Human and Organisational Factors Working Group: for instance, the UIC is creating, with the help of ERA, a Digital Platforrm related with HF expertise.* ➤ *GLCN / ELCF: sharing of best practices on Level Crossings, worldwide with the Global Level Crossing Network, or with the European Level Crossing Network.* ➤ *TRESP-N: Trespass and Suicides prevention Working Group, that has been recently created.*		

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