

CSM ASLP

The big picture document

This document summarises the views, understanding and concerns of ALLRAIL, CER, EIM, FEDECRAIL, ERFA, NB Rail and UIP on the **Agency's big picture document (CSM ASLP)**. The input provided with this paper is based on the discussions at the NRB workshop in Brussels on 03.10.2019.

ALLRAIL, CER, EIM, FEDECRAIL, ERFA, NB Rail and UIP fully support the exchange of safety related information at European level in order to increase the safety level and help improving the safety performance of the actors.

Key points	GRB understanding/ position
Acceptance	<ul style="list-style-type: none"> Definitions (provided by the Agency) <ul style="list-style-type: none"> Safety level: <ul style="list-style-type: none"> A measurement of reported safety-related occurrences obtained with normalized (and weighted) counts Safety occurrences have to be complemented by a severity scale measure related to the potential risk, not only indicating the real consequences. Near misses/Close calls have to be considered as safety occurrences. Safety performance: <ul style="list-style-type: none"> An assessment of the capability and maturity of processes to manage, prevent or mitigate safety risks with risk control management activities Safety performance must also regard the authorities' proper activities (risk management, mitigation and control)
Understanding	<ul style="list-style-type: none"> The assessment of the safety level and safety performance includes <ul style="list-style-type: none"> A reference list of events and Risk Control Measures The new ASLP tool (CSM ASLP Information Sharing System) as proposed by the Agency will be a dynamic tool (root causes and risk control measures) beyond a static collection of SMD
Assumptions	<ul style="list-style-type: none"> Safety related information is channelled through the NOR to the European level Taxonomy from the COR project should be used as a starting point
Beliefs	<ul style="list-style-type: none"> No double reporting The choice of the risk control measures is up to the actor and not standardised but a high-level taxonomy of Risk Control Measures must be defined. The comparison of the estimated safety level (of a railway undertaking) with reference levels only makes sense if the operational portfolio (services provided e.g. HS, IC, regional) is comparable, otherwise it will be a comparison of apples and oranges Structured supervision by NSAs will be enhanced Application of the CSM-RA regulation will be enhanced

Key points	GRB understanding/ position
Concerns	<ul style="list-style-type: none"> • Extent of the information sharing • Double reporting to any extent • Extra burden for actors and more costs • IT maturity of actors to collect data must be assessed • Collecting data for the sake of data collection and data of no use for the actors • Effectiveness of qualitative criteria to implement RCM
Request	<ul style="list-style-type: none"> • Confidential safety related information must be kept confidential • Limit the discussion on CSM ASLP to the concerned platforms (i.e. ERA WP) • The impact assessment shall be the starting point for necessary discussions on the future CSM ASLP. The Agency shall not use the impact assessment to force or leave parts out in the discussions to come. • The CSM ASLP should be developed step-by-step in order to develop the CSM ASLP to a fully mature level (incl. the further development of tools, possible integration of other reporting schemes like the JNS/SAIT, etc.) • A step-by-step approach is necessary in order to ensure a correct implementation by all railway actors in the Union as we believe that the timeframe for developing the CSM ASLP being a very complex and difficult topic is very short. • Re the reportable occurrences, the taxonomy needs further discussion in order to determine the phased application.
Specific CER and UIP request	<ul style="list-style-type: none"> • Discuss the future role and status of the Joint Network Secretariat (JNS) in this respect, and redesign the SAIT principles accordingly