

CER Position Paper

Brussels, 21 December 2016

COR – Safety Management Data system

COR SAFETY MANAGEMENT DATA SYSTEM

Summary

With this Position Paper the Community of European Railway and Infrastructure Companies (CER) responds to the stakeholders consultation on the “COR Safety Management Data system” of the European Union Agency for Railways.

CER believes that the exchange of appropriate safety related data brings added value to all players in the sector and supports the Agency’s approach as outlined in the accompanying documents to the COR projects. CER fully supports the work of the Agency in terms of advancing COR.

Nevertheless, some issues in the COR project remain open points and need clarification and further discussion. CER acknowledges the concerns of some NSAs, and some CER members, in terms of national reporting versus European reporting as these parties already have mature reporting (and risk analysis) systems in place. Therefore CER supports linking the national reporting and the European reporting, to avoid the need for parties to input information twice.

The basic principle of a move to more harmonised common occurrence reporting is fully supported. CER underlines that the common occurrence reporting is regarded as a benefit for the sector and NSAs for the harmonised supervision in the frame of the SSC. Any solution to be found in the near future in terms of linking national and European reporting must not become a burden for the sector, or lead to an unintended consequence of disruption to existing national approaches and safety performance

1. General comments

- CER supports a form of enhanced safety management data capture at European level.
- CER objects to any double reporting of information. Therefore an interface between the national and the European reporting system shall be ensured/established.
- CER requests keeping the record of historic data in the reporting system(s) and avoid losing such information.
- CER acknowledges the need to take into account the requirements from existing national systems, and that these must be retained where safety performance benefits are being realised.
- CER believes that the data shall be accessible for all actors as defined in the Rail Safety Directive – Article 4 as well as the Agency and the NSAs.
- The COR safety management data system is a way to enhance the efficiency of monitoring and supervision for the Agency and the NSAs providing appropriate levels of access are first agreed with industry as originators and owners of the data
- CER objects to any proposal of a revision of Annex 1 in the RSD at the current stage.
- CER supports the approach of using the CSIs as starting point for the event classification and migrate towards the event classification and taxonomy as described in the respective Agency paper.
- CER does not see a need for additional legislation for the common occurrence reporting approach or associated data capture tool. CER supports a proper implementation of the approach with clear guidance and support from the Agency. The legal framework of the 4th Railway Package's Technical Pillar is comprehensive. If the supervision by the NSA through the tool needs to be defined in additional legislation (i.e. revision of CSM on CA and CSM on Supervision) CER would be supportive.
- CER sees the need to clearly define the roles and responsibilities of the actors and players (incl. the Agency and NSAs).
- The proposed system should not prevent, restrict or replace existing / planned national systems that are developed by the sector to manage their own safety arrangements in line with CSMs. The proposed COR Safety Management Data System should therefore seamlessly **interface** with these existing national systems in that relevant existing data is transferred seamlessly to it i.e. there should be no 'double data entry' requirement placed on our sector for those organisations that already have such a system.

2. Detailed comments

2.2 Building Blocks and Phasing

Reference: Phasing the COR Safety Management Data system – ERA-PRG-004-TD-004 – 27.09.2016

Chapter	Building block	CER recommendation	CER justification
6.4.1.1.	Operational scope	Option 1	Splitting freight and passenger operations is neither appropriate nor helpful. The “all or nothing approach” shall be followed here. A split and /or gradual approach to data would mean an incomplete and more or less useless dataset in the beginning.
6.4.1.2	Geographical scope	Option 1	Building groups of Member States might lead to different developments and learning curves and huge difficulties and costs for stakeholders. The common occurrence reporting and the implicit supervision by the NSAs shall be implemented in all MS equally.
6.4.1.3	Purpose	Option 1	Option 1 is a sound approach to achieve the fully supported target system.
6.4.2	Event classification	Option 1	Build on a small set of the existing classification (Annex 1 RSD) and migrate step by step to the full set of Annex 1 RSD and finally in the last step on to the target system. We do not support any deviation from commonly well understood and implemented approaches.
6.4.3	Obligations	Option 3	In order to ensure the completeness of data and the involvement of all actors, the approach shall be mandatory [1 – see footnote]. A voluntary approach will not lead to complete and comprehensive set of data.
6.4.4	Tool	Option 3	In addition, taking into account that several actors could be involved in the same event and to avoid useless entropy among COR users in front of

		<p>different reports, CER members believe that the efficiency of data to be collected in the SMDS, could be better ensured if in each MS the NSA will be responsible of the final data-entry in the COR in such case.</p> <p>The NSAs must be concerned in collecting data from all involved actors and to forward them in an integrated report, in agreed time, to EUAR web common interface.</p> <p>In addition to avoiding unchecked and inconsistent input in the SMDS by different stakeholders on the same event, this will provide assurance to the sector on the reliability of data extracted by COR for safety assessments purposes.</p> <p>CER believes that the preferred interface should be an interoperable SOA (Service oriented architecture) type based, for example on XML files.</p>
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[1] The Rail Delivery Group (RDG) is in favour of a voluntary approach.

2.2 Legislative Aspect

CER is convinced that the legal framework set by the 4th Railway Package's Technical Pillar is comprehensive. At the current stage no additional legislation is needed to proceed with the common occurrence reporting project and its later implementation.

Nevertheless, CER would support linking the common occurrence reporting to the intended revision of the Common Safety Method for Conformity Assessment and Common Safety Method on Supervision as foreseen in the framework of the implementation of the 4th Railway Package's Technical Pillar.

The link between the Common Safety Method for Conformity Assessment setting the harmonised way in which all NSAs approach assessments prior to the granting of safety certification and safety authorisations, the Common Safety Method on Supervision providing a common guideline for supervision to make sure NSAs give appropriate effect to supervise that the Railway Undertakings and Infrastructure Managers have and implement effectively their Safety Management Systems (SMS) and the common occurrence reporting is evident.

CER comments

Common Occurrence Reporting



However it remains a fundamental view of CER that safety management data is principally the responsibility of industry to define and manage, as defined by European legislation particularly the CSM for Monitoring. Although sharing a subset of this data, and the way in which it is interpreted and used to best effect in more mature national circumstances, is supported if used for the intention of improving safety performance across the EU.