

CER Position Paper

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COR – Exchange of safety related information in the railway sector

COR – EXCHANGE OF SAFETY RELATED INFORMATION IN THE RAILWAY SECTOR

Summary

With this Position Paper the Community of European Railway and Infrastructure Companies (CER) reflects upon the exchange of safety related information in the European railway sector.

CER has expressed its strong concerns on the existing SAIT tool launched by the European Union Agency for Railways at the 2016 Innotrans in Berlin. The tool is currently hardly used by the actors of the European railway sector since the tool (as currently) configured is poorly conceived and the sector is therefore highly concerned about this.

Nevertheless, the sector is convinced that the exchange of safety related information is essential. CER believes that an appropriate framework and tool needs to be shaped.

In order to address these concerns, CER suggests in this Position Paper a rough framework for improving such a mutual exchange IT tool.

1. Background

The European Union Agency for Railways launched SAIT at the 2016 InnoTrans in Berlin. The underlying principle is that, according to the Agency, "SAIT is a secure website which will grant registered users the ability to share information about safety risks relating to defects of technical equipment between the European railway actors. SAIT allows quick sharing of information about new or poorly understood risks in order to allow other actors to revise and improve their own risk management methods and avoid accidents".

In principle CER is open to such a system, as such information sharing is a part of a good safety culture. Nevertheless, CER members are highly reluctant to use SAIT due to big uncertainties concerning who should be using the system, the possible consequences of SAIT messages with respect to legal liabilities, the handling of messages, the quantity of information and consequently the resources required of organisations and the restriction of access and use of data for and by NSAs.

CER believes that systematic technical irregularities, risks or hazards have to be investigated by the stakeholders and the NSAs need to be aware of them. This CER Position Paper suggests a rough framework for improving such a mutual exchange tool.

2. Reflections on a Mutual Exchange IT Tool (MEIT)

Nowadays the exchange on systematic technical irregularities and hazards is a crucial part of the state of the art of a good safety culture. This exchange can be done by different means:

- Exchange at dedicated conferences/ meetings or
- Specialised IT tools in a segmented or in a general way.

Nowadays the railway operating community undertakes formal and informal exchanges about hazards and safety related issues. Such exchanges are due to different legal requirements. However, exchanges are not always systematically practiced.

In order to foster safety and the quality of exchanging safety related information by such an exchange IT tool, the following four conditions are crucial:

- **Trust:** No disadvantages by undertaking the exchange of safety related information
- **Uniqueness:** No redundant channels for exchanging safety related information
- **Consistency:** relevant and updated information and knowledge about the risk
- **Anticipation:** Following the approach of HRO (High Reliable Organisation)

3. Principles of a Mutual Exchange IT Tool (MEIT)

3.1 MEIT shall not be used for information with direct safety relevance

The exchange of safety related information often implies an immediate reaction by the affected parties. Therefore an official and mandatory information procedure is necessary. Such information channels exist in national safety management systems with NSAs being involved. In case there are gaps (either at national or European level) they have to be closed. This must be done in a more formal way as foreseen by the SAIT IT tool objectives.

Actions after such a kind of safety related information exchange may have legal implications. A juridical threat on developing learning culture is counter-productive. Therefore MEIT has to be separated from a pure and dedicated "Safety Alert System".

Against this background, the present denomination "SAIT" for Safety Alert IT Tool is not adequate for the initial intended goal as the title "safety alert" is inappropriate for the huge majority of underlying possible risk levels.

3.2 MEIT shall not compete with or duplicate other institutionalized experience exchanges.

Existing experience exchange institutions, procedures or tools have priority to MEIT. E.g.: Exchanges in the scope of RU or IM monitoring and investigation, ECM activities or ETCS operations. MEIT should have a subsidiary role to these formal exchanges.

3.3. MEIT has to be used primarily for information about hazards.

MEIT shall support primarily the exchange among experts about the presence of a physical condition, situation or series of events that have the potential for causing harm to people, property or the environment. The information shall be based on several observations and ideally should include consequences and next steps. Information about some simple observations "insignificant risks" has to be excluded. Clear indications about systematic issues are relevant. The information exchange takes place on expert or engineer level and not on a management and NSA level. **MEIT shall not be used to exchange urgent information about immediate safety risks.**

3.4. Step-wise implementation of MEIT

Without mutual trust, a fruitful information exchange will not be possible. In order to build trust MEIT has to be introduced step by step. For a first step it needs to be clarified who precisely the system is to be used by. In addition, it is suggested that a reduced scope of subject areas should initially be considered and worked examples discussed with the sector. It is suggested that once the principles of operation are agreed the scope of the system can be expanded – as appropriate.