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Position Paper

Brussels, 17 November 2020

The use of SAIT



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The Agency, the Member States and the sector stakeholders have been intensively discussing about the exchange of safety related information for many years and continuous - however little and arduous - progress has been made. ALE, CER, EIM, EPTTOLA, ERFA, FEDECRAIL and NB-Rail (in partnership with UIC) believe that we now need to jointly focus on one important remaining issue in this respect: the use of SAIT in the framework of the ECM Regulation 2019/779. We believe that a timely start of such activity is necessary in the light of the entry into force of the article 4 of the ECM Regulation on 16th June 2021.



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1. Background

Article 4 (entering into force on 16th June 2021) of COMMISSION IMPLEMENTING REGULATION (EU) 2019/779 of 16 May 2019 laying down detailed provisions on a system of certification of entities in charge of maintenance of vehicles pursuant to Directive (EU) 2016/798 of the European Parliament and of the Council and repealing Commission Regulation (EU) No 445/2011 (that entered into force on 16th June 2020) defines that the entity in charge of maintenance shall use the Safety Alert IT or another informatics tool provided by the Agency for the exchange on new or unexpected safety relevant findings including exceptional maintenance findings beyond wear and tear, in relation to vehicles, subsystems or other components.

2. Sate of play

The SAIT tool was set up by the European Union Agency for Railways for the exchange of safety related information. The first entry in the tool was made on 03.08.2016 and the latest one on 11.07.2018. (State of play: 06.11.2020) With 17 entries – of which four are test entries (not being “cleaned up”)- it can be stated that the tool is neither broadly used by any railway actor nor properly maintained by the Agency. The information in the tool is provided in English without translation and the NSAs are excluded from its use and access so far. ECM Certification Bodies are also excluded and will only have the opportunity to assess the implementation of this requirement during ECM audit stage 2 on site.

3. Problem Statement

In this condition, the SAIT tool and its underlying reporting principles are neither fit for purpose regarding the broad exchange of safety accurate related information between all entities in charge of safety nor for the exchange on safety components. An identification of components is missing in the drop down menus of the IT tool.

4. The need for a way forward

On 16.06.2021, SAIT must be fit for purpose allowing entities in charge of maintenance to exchange on new or unexpected safety relevant findings including exceptional maintenance findings beyond wear and tear, in relation to vehicles, subsystems or other components. It should further be possible to provide information on the potentially related causes and circumstances of the safety relevant findings. SAIT shall be simplified and adapted in a way that these findings can be entered also in a standardised way (drop-down menu) and displayed in a standardised manner in all official languages of the European Union – except for those countries without a railway system. The target group (and other involved entities) for SAIT shall be discussed at a later stage after the basic functionalities are set up in a sound way.

5. Proposal for a staged approach with a pilot project

- **Actors:**
 - Start the pilot project “the use of SAIT” with entities in charge of maintenance allowing them to fulfil their legal obligations (COMMISSION



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IMPLEMENTING REGULATION (EU) 2019/779 of 16 May 2019 laying down detailed provisions on a system of certification of entities in charge of maintenance of vehicles pursuant to Directive (EU) 2016/798 of the European Parliament and of the Council and repealing Commission Regulation (EU) No 445/2011 – Article 4.6)

- **Scope:**
 - Facilitate the use of SAIT with a predefined list of components:
 - Axles
 - Wheels
 - Wheelsets
 - with the possibility for new entries of components/subsystems
- **Timeline**
 - Define the timeline (Start date: 16.06.2021- End date) for the SAIT pilot
- **Roles & Responsibilities**
 - Describe the use of SAIT in the bigger picture of CSM ASLP & work of the GoA involving the ERA ECM Task Force for the ECM aspects
 - Describe roles & responsibilities of the involved actors
 - Ensure an active support / moderation by ERA, right of ERA to send questions to reported cases
 - ERA to ensure that NIB reports are linked/referenced on SAIT (by ERA not by NIB)
 - Ensure that JNS urgent und normal procedure is linked to SAIT
 - Manufacturers of rolling stock and components should be involved
 - Define the role and potential involvement of the NSAs

6. Practical arrangements

- Make SAIT IT-wise fit for purpose (IT functionalities & languages)
- Agree on a maintenance scheme for SAIT to be carried out by the Agency (regular cleaning up)
- Publish (after the consultation with the sector) "Practical arrangements for the use of SAIT" incl. roles & responsibilities (i.e. key contact persons)
- Align the "Practical arrangements for the use of SAIT" and the ECM Regulation Application Guide and include a description of the relation with the JNS process

7. The next steps & timeline

1. Implementation of an ERA working group with sector participation – December 2020
 - a. Determining whether a pilot should be formed
 - b. If so - is the sector proposal accepted?
 - c. Determination of members - process should be kept very short
2. Kick-off working group - January 2021
3. Programming pilot by ERA - April 2021
4. Start pilot May 2021