

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

8 March 2023

Bern, 20-24 March 2023

Item 7 of the provisional agenda

Accidents and risk management

Report on the coordination meeting of 15 December 2022 on improvement of Transport of Dangerous Goods occurrence reporting

Submitted by the European Union Agency for Railways (ERA)

Summary

Executive summary: For facilitating the understanding/discussion of informal document INF.8 presented at the Joint Meeting of September 2022 in Geneva as a contribution to the on-going activities of the UNECE/OTIF Working Group (WG) on improvement of accident reports (in particular to informal document [INF.47](#)), the conclusions of the coordination meeting organised by ERA on 15th December 2022 on the improvement of Transport of Dangerous Goods (TDG) occurrence reporting are made available.

Related documents: Informal document INF.8 (Joint Meeting, September 2022); Informal document [INF.47](#) (Joint Meeting, September 2020); Proposal OTIF/RID/GTP/2022/9 transmitted by Belgium and informal document [INF.3](#) by ERA (15th Session of the RID Committee of Experts' standing working group, November 2022).

Background

1. At the Joint Meeting of September 2022 in Geneva, ERA presented the informal document INF.8 as a contribution to the on-going activities of the UNECE/OTIF WG on improvement of accident reports (in particular to [INF.47](#)) and to the previous coordination meeting on the improvement of TDG Accident reports held in Brussels on 17 December 2019 (minutes available [here](#)).
2. As agreed, ERA organised another coordination meeting (on-line, via TEAMS) on 15 December 2022 to discuss remaining comments.
3. Three main agenda items were discussed as follows:
 - Review of comments received on informal document INF.8 and clarification of misunderstandings;
 - Review of the ERA proposed contribution to UNECE/OTIF working group (INF.8 proposal);
 - Conclusions and way forward (i.e. feedback to be presented at the Joint Meeting in March 2023).

Conclusions of the coordination meeting

4. The detailed minutes of the coordination meeting are submitted in the annex to this document for the attention of the Joint Meeting delegates.
5. The main conclusions are reproduced below:
 - Comments received at RID Standing Group and other comments, as well as misunderstandings were clarified. After the review of the comments, the answers prepared by ERA were globally supported.
 - The group did not identify the need to change the Common Safety Methods on the Assessment of Safety Level and Performance of Railway Operators (CSM ASLP).
 - Several possibilities to change RID were identified and would need continued discussions at UNECE/OTIF WG. For example, further discussions/clarifications could be beneficial for:
 - (a) triggering criteria in accordance with RID,
 - (b) the two steps/phases reporting in RID/ADR/ADN.
 - The use of the future Information Sharing System (ISS) and national systems can be interfaced, and the use of the ISS may be a positive step forward also for TDG occurrence reporting for countries who have no reporting system.
 - It was agreed on the benefit/need to restart the work of the UNECE/OTIF working group on improvement of accident reports, to complete its work/tasks.
 - After the work of the UNECE/OTIF WG will be continued, a further coordination meeting could be organised to update the participants of this meeting on the follow-up decisions/developments.

Annex

Minutes of Meeting

Coordination CSM ASLP/RID on improvement of TDG occurrence reporting

TEAMS (on-line), 15.12.2022

Introduction (including focus of the meeting)

ERA welcomed, thanked and invited the participants to introduce themselves; a quite balanced participation between RID members and EU NSAs was noted.

ERA reminded the focus of the meeting aiming at discussing [INF.8](#) proposal and the comments received. It was also reminded that the proposal represented a contribution to the on-going activities of the UNECE/OTIF WG on improvement of accident reports (in particular to [INF.47](#)) and to the previous coordination meeting CSM ASLP/UNECE-OTIF WG on improvement of TDG Accident reports held in Brussels on 17/12/2019 (minutes available [here](#)), in the context of the draft Regulation ERA 1219 (CSM ASLP) under adoption process by EC (DG Move).

For the meeting ERA proposed three main Agenda items:

- *Review of comments received on document INF.8 and clarification of misunderstandings*
- *Review of the ERA proposed contribution to UNECE/OTIF working group (INF 8 proposal)*
- *Conclusions and way forward (i.e. feedback to be presented at the Joint Meeting in March 2023)*

The minutes of this meeting (including agreed views on the improvement items and also dissenting views) were prepared by ERA for the attention of the Joint Meeting delegates and the UNECE/OTIF working group on the improvement of TDG occurrence reporting. The minutes were submitted for comments to the meeting participants, finalized by ERA, and submitted as informal document to this Joint Meeting (March 2023).

Review of comments received on document INF.8

The contribution/document [OTIF/RID/CE/GTP/2022/9](#) prepared by Belgium following INF. 8 was briefly discussed already at the 15th Session of the RID Committee of Experts' standing working group, together with the related supplementary contribution/comment by ERA ([INF.3](#)); both the documents dealt with the triggering criteria for reporting. These documents received already comments during RID Standing group meeting and, after it, also later additional comments were addressed to ERA. The discussion of this meeting section was based on those elements, going through them and asking/looking for a kind of exhaustive feedback.

The Chair of the RID Standing group presented briefly the table and triggering criteria in OTIF/RID/CE/GTP/2022/9 as reaction on proposal INF 8 by ERA. The table showed when the report of an occurrence will be required for the CSM ASLP and when it is required under RID; it indicated how either in the cases of significant or not significant accidents there are occurrences that should be reported both in the CSM ASLP and RID and occurrences to be reported instead only under the CSM ASLP (since the triggering criteria are different).

Also the Chair of the UNECE/OTIF WG on improvement of accident reports reminded the main work delivered by that WG before the activities were interrupted by COVID, with the proposed terms of reference. He also mentioned the on-going work in France on a dematerialized accident reporting for all modes, which will be presented in the next Joint meeting RID/ADR in March 2023.

Then ERA presented the supplementary contribution in INF.3. Basically, it is the same table as presented in OTIF/RID/CE/GTP/2022/9 but with some additional details on the different triggering criteria under CSM ASLP and RID, to show the complexity (and the differences) related to them. During the presentation ERA also mentioned some doubts/difficulties encountered with some criteria in RID (e.g. lack of a timeframe in the definition of death, uncertainties related to the imminent loss of product or intensive medical treatment, etc.). During ERA presentation, the Chair of the RID Standing group proposed some adjustments in the table in relation to the involvement of authorities, the involvement of emergency services, the evacuation of persons and closure of traffic routes (which according to her, do not represent separated/independent criteria under RID).

Several participants indicated that it was important to distinguish clearly in the report actual loss of products from imminent loss (no actual loss) as it was an indication of the good or less good behaviour of the containment.

It was also noted that the threshold of 50000 euros could be difficult to assess within a short time period and should then not be used as a criterion for triggering short term reporting. ERA confirmed that this criterion is not used by the CSM ASLP for triggering a simple report.

Then ERA presented the comments received on proposal INF 8, together with the provided answers (reported also in the Annex). The main clarifications are summarised as following:

CSM ASLP does not change RID provisions; it only proposes a better sharing of information. It offers to operators to use the Information Sharing System (ISS) to report in accordance with RID (facilitating the sharing of TDG information). CSM ASLP regulation and the ISS are fully compliant with the GDPR regulation (guaranteeing anonymity of sensible and specific interest data). CSM ASLP will also offer the possibility to connect other systems. The CSM ASLP (and the INF.8 proposal) do not foresee two different version of a report, but complementary parts of a report made at short term and then supplemented at long term. The proposal in INF.8 was based on further improvement discussed in the UNECE/OTIF WG on improvement of accident reports; it is not a new proposal by ERA. The CSM ASLP requires mandatory reporting for involved operators (namely IMs/RUs), but it allows also for voluntary reporting by interested parties (e.g. filler, loader, unloader, etc.).

In summary, during the discussion the participants to the meeting considered/agreed that:

- It would be good/useful to have an (early) indication on when an occurrence involved dangerous goods (even if not meeting the RID criteria), as currently foreseen in the CSM ASLP (also to show for example the cases in which there was an accident involving a train/wagon transporting DG, but the containment was working well/properly, i.e. information on how efficient is the regulation)
- There are some opportunities/needs (seen positively by the group) to clarify/(improve) when needed, some RID reporting criteria to avoid some possible different/unharmonized interpretations as it could be identified the discussion that not every RID expert interpret the RID requirement to report in the same way (i.e. to guaranteeing at least a common and clear understanding for everyone). For this point further discussions are foreseen in the UNECE/OTIF WG on improvement of accident reports.
- Some information on the accidents falling under RID could be available not immediately; this led to a discussion on a possible two-step reporting in the UNECE/OTIF WG on improvement of accident reports. Anyway, some doubts were expressed (e.g. NSA BE) on the proposed approach to have a two phase reporting (short term and then supplementary information at long term), proposing as an alternative the possibility to simply prolong from one month to two months the deadline to report according to RID, giving only a simple indication on when an occurrence involved dangerous goods (even if not meeting the RID criteria) at the beginning. ERA indicated that the 2 phases reporting is functionally necessary for the correct implementation of the CSM ASLP which also apply to TDG occurrences. FR supported the extension to 2 months for the reporting of the full report and indicated that the short-term report is useful and is not in contradiction with 1.4.1.2 of RID requiring immediate notification of occurrence, however the content of both parts of the report could be redefined and remains open for further discussion in their view.
- All the comments received could be clarified in a satisfactory manner, even if in the course of the discussion some points were identified for which more discussions/works in the multimodal group (UNECE/OTIF WG on improvement of accident reports) would be useful.

Review of INF 8 proposal

ERA presented point by point (as reported below) proposal INF. 8 which covers the terms of reference of the UNECE/OTIF working group.

Item a) Clarify the purpose of reporting information on accident and identify the use of the reported information.

The UNECE/OTIF working group generally agreed that the work on improving the report should aim at:

- learning lessons for single occurrences (especially for very severe and typical accidents);
- learning lessons for frequently occurring events, even if they do not seem important individually;
- collecting the relevant data for risk analysis.

Possible further improvements of the current achievement should be to better align reporting criteria which are not completely aligned for the moment. The discussions in the previous points have confirmed that there are some questions remaining on what and when to report and there are examples where different persons would/could report differently according to RID depending on their interpretation. The group agreed that possibilities of improvement could be covered/discussed in the follow up actions of the UNECE/OTIF working group on improvement of accident reports

Item b) Clarify the participants responsible for sending the report and/or complementary information.

RID is indicating that several participants may be the reporter in accordance with 1.8.5.1 (i.e. the loader, filler, carrier, unloader, consignee or if the case may be the railway infrastructure manager).

In a slightly different manner, the CSM ASLP will systematically require each operator involved in the occurrence to provide an occurrence report, namely the Infrastructure Manager and the Railway Undertaking(s) to report, while RID does not require a report from each of those parties. In addition, any other interested parties will be entitled to provide reports on an occurrence.

The respective contents of the CSM ASLP and RID occurrence reports can be made fully consistent and complementary offering an easier reporting framework for railway operators, avoiding duplicated reports to authorities (see also point g). The draft proposal for amendments in Annex II of INF. 8 aims at achieving this consistency and complementarity, indicating the parts of the report that is covered by the reporting in accordance with the CSM ASLP.

In this approach RID may allow operators to fill-in the railway report parts in accordance with the CSM ASLP as a sub-part of the RID occurrence report.

The CSM ASLP will allow operators to supplement their CSM ASLP reports with the RID occurrence report in accordance with RID 1.8.5.

As further improvement, it is suggested to provide RID reports in two steps:

- Within 72 hours, the ‘simple report’ part
- Within 2 months, the ‘detailed report’ part

The discussion on this point indicated that a good coordination between CSM ASLP and RID will allow to avoid any duplication of effort for TDG occurrence reporting; however, in some way RID should clearly indicate that the report according to CSM ASLP is fulfilling RID reporting at the same time and that RID reports should be provided also to ERA (or ISS). Further discussions are foreseen in the UNECE/OTIF working group on improvement of accident reports.

On the two steps approach instead, it was concluded/agreed that there is no need to change the CSM ASLP and the two steps report is understood on the CSM ASLP side. The discussion on if/how apply a two steps report also in RID then was left to further discussions in the UNECE OTIF WG, knowing that maybe not all the delegations will have the same view (e.g. SE indicated that for some national rules/indications to be respected, the two steps approach in RID is not supported by Swedish TDG expert).

Item c) Examine anonymity issues

In the course of the CSM ASLP developments the data protection applicable within the EU has been thoroughly applied. As a result, the CSM ASLP will establish clear and strict ‘sharing rules’ for each data item required for reporting. Those rules are fully consistent with the treatment of personal data as indicated in the cover sheet of the occurrence reporting in accordance with RID which reads: “(The competent authority shall remove this cover sheet before forwarding the report)”.

TDG Competent Authorities are clearly identified by the CSM ASLP and within the EU they are also required to protect personal and specific interest data in accordance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

No further improvement needs were identified in this area.

Item (d) Study the relevant information necessary according to the different possible use, such as: lessons learnt from single occurrences, lessons learnt from repeated occurrences, risk assessment, and propose relevant improvements to RID/ADR/ADN

This point has been fully taken into account from the starting development of the CSM ASLP. The different type of reports and the supporting processes, including the setting of the Group of Analysts aims at totally fulfilling point (d).

It integrates the required information and involve the necessary actors in the field of dangerous goods, as follows:

- The RID occurrence report is supplementing the information needed for learning on railway occurrences in general;
- The TDG Competent Authorities are given a clear role by the CSM ASLP allowing them to request a review of the information reported by operators when needed;
- As any other parties, the TDG CA will be entitled to report their own report, if needed, in addition to the ones required to the railway operators involved in an occurrence;
- Other interested parties will be entitled to provide reports on voluntary basis.

As further improvement, it is advised that RID requires the sharing of RID occurrence reports (to the exclusion of GDPR data) with the other parties to effectively support collective learning, as it will be required by the CSM ASLP information sharing rules.

Within the EU sharing of information will be systematically between the relevant parties, in accordance with the sharing rules established by the CSM ASLP Regulation, including information related to TDG occurrences.

The sharing of information will be protected and secured by the ‘Information Sharing System’ (ISS) also established in accordance with the CSM ASLP Regulation.

BE and FR supported the use of a reporting tool like the ISS. ERA indicated that the ISS will also allow pre-existing systems to be connected to it.

Further development towards a multimodal tool may also be feasible in the context of RID/ADR/ADN, as the TDG reports should be harmonized and could also use an adapted – multimodal-ISS, offering the same level of functionalities and data protection.

UIC indicated that the same treatment for TDG occurrence reporting should take place for each mode in RID/ADR/ADN.

The possibility to give access to non-EU parties, and /or to develop a multimodal-ISS, based on the rail-ISS, may be further investigated by DG MOVE and the Agency, also in cooperation with the UNECE and OTIF. ERA indicated that for some of its tools, solutions to give access to non-EU MS were found and were already implemented and that it should be also feasible for the future ISS.

Item (f) Exchange of experience from competent authorities on methods used to ensure the accuracy of accident reporting

The CSM ASLP will set up the Group of Analysts and will request this group to propose any efficient safety-related improvements, including on the quality of shared safety data and information, based on an analysis of the collected data and CSM ASLP review process.

As a result, the Group of Analysts may propose harmonized improvement of the CSM ASLP requirements, including the improvement of the reporting content.

When concerning TDG carriage, such Group of Analysts proposals may also be discussed with the Joint Coordination Expert Group of DG MOVE/OTIF and with UNECE/OTIF Joint Meeting to ensure full multimodal consistency of the proposed improvements.

No further actions are needed on this item.

Item (g) Take into account relevant input including the contributions provided by the transport of dangerous goods workshop for risk management, in particular the list established by workgroup A and the “input parameter table” for the harmonized risk estimation model

During the process of development of the CSM ASLP the Agency took a particular attention on the definition of the occurrence reporting information to be collected in order to enable the setting of useful correlations and statistical inference that could feed the risk management framework. A full railway taxonomy has been developed that will be used in the CSM ALSP Regulation.

The working group on the improvement of occurrence report also developed a harmonized multimodal RID/ADR/ADN report that could be adopted for biennium 2025.

To ensure full consistency with the railway taxonomy of the CSM ASLP, several (minor) improvements of the railway dataset have been identified and are proposed in annex II of this document.

Basically, the content remains similar to the harmonization proposed by the UNECE/OTIF working group, however it is organized in a slightly different manner and railway terms are fully aligned where needed.

Those improvements will ensure a full consistency with the CSM ASLP taxonomy for the general railway terms and a full complementarity of the CSM ASLP with RID updated reports, as suggested in item b).

As a further improvement, and in addition to the reporting of operation volumes (train.km; ton.km...) required by the CSM ASLP.

As possible improvement it would be useful that RID requires the reporting of DG volume of transport per class of DG and per type of containment (small/medium/large).

It would better support the implementation of risk studies with the future risk management platform (see March 2022-INF 22). For a single operator, those type of data are classified by the CSM ASLP, as protected commercial data, and the ISS would apply specific – protected- sharing rules.

Item (h) Take into account the relevant IT tools, including the coordination with the development of “common occurrence reporting system” (COR)

With the improvements suggested in points a) to g) the point h) would be fully implemented and would ensure an efficient and well-managed reporting system, implementing the CSM ASLP and RID in a non-duplicated, complementary, and consistent manner.

Annex II to document INF 8 suggested a draft RID occurrence report including the necessary amendments capturing all the work developed by the UNECE/OTIF work group and the CSM ASLP working party.

The Information Sharing System will be able to support the implementation of both reporting CSM ASLP Regulation and RID occurrence report, facilitating the implementation of the reporting obligations by the requested actors.

National reporting systems, when they exist, will have the possibility to directly exchange information with the ISS through machine-to-machine interface.

FR indicated that they intend to provide a demonstration of the FR reporting system at the Joint Meeting in March 2023.

Conclusions and way forward

In summary, the main concluding points of the meeting were:

- Comments received at RID Standing Group and other comments, as well as misunderstandings were clarified. After the review of the comments, the answers prepared by ERA were globally supported.
- The group did not identify the need to change the CSM ASLP.
- Several possibilities to change RID were identified and would need continued discussions at UNECE/OTIF Working Group. For example, further discussions/clarifications could be beneficial for: 1) triggering criteria in accordance with RID, 2) the two steps/phases reporting in RID/ADR/ADN.
- The use of the future ISS and National systems can be interfaced, and the use of the ISS may be a positive step forward also for TDG occurrence reporting for countries who have no reporting system.
- It was agreed on the benefit/need to restart the work of the UNECE/OTIF working group on improvement of accident reports, in order to complete its work/tasks.
- After the work of the UNECE/OTIF WG will be continued, a further coordination meeting could be organised to update the participants of this meeting on the follow-up decisions/developments

Appendix to the minutes - Review of comments and clarification of misunderstanding

| Comments | Answer |
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| Limited advantages in <u>harmonising</u> the two systems of reporting | CSM ASLP offers the operators to use the Information Sharing System (ISS) to report <u>in accordance with RID</u> . It will reduce operators' effort and facilitate sharing of information |
| RID reporting will be ' <u>merged</u> ' into the CSM ASLP | CSM ALSP does not change RID provisions (no merging but two complementary reporting) |
| Any guarantee that the data collected would be anonymous | Yes, CSM ASLP Regulation and ISS is fully compliant with GDPR |
| CSM ASLP will establish an extensive data collection | Criteria for reporting are very close to RID in term of number of reports to be notified by operators even if the triggering criteria are not exactly the same. |
| Railways will be treated differently than the other modes | Current RID/ADR/ADN requirements for TDG occurrence reporting are the same in both modes. UNECE/OTIF improvement proposal is multimodal. |
| Are different versions of reports of any use (simple/detailed report) | It is not different versions of report but complementary parts of a report made at short term and supplemented at longer term. Such obligation already exists in railway law for the information of authorities within short term to enable decision to investigate (or not), and later terms reports allows time to collect correct and detailed information on causes and consequences |
| Use of tick boxes that do not include further explanations | Current RID/ADR/ADN reports use tick boxes. CSM ASLP offers systematically the possibility to add a free text explanation. Tick boxes facilitate reporting and is a must for harmonised and digitalised sharing of information |
| The existing RID system was about assessing and improving the regulations where necessary | This objective also applies to CSM ASLP (see group of analysts and JNS requirements) |
| The data in the system planned by ERA would also be used for assessing undertakings | Yes, it is a railway safety directive obligation also applicable to operators carrying dangerous goods by rail. |
| The data in the system planned by ERA would also be used for risk assessment | Why the use of data in accordance with RID should be limited to regulatory amendments when railway operators also have the obligation to learn from occurrences and to avoid re-occurrence or limit the consequences of similar accidents? (see safety advisor duties) |
| Not in favour extending ERA system to other modes of transport | Why investments in ICT systems should be made several times in each country and by each operator when one organisation could only invest once for all? |
| Dangerous goods were involved in about 8%, but did not meet the criteria of 1.8.5. A further 10% could be classified as safety-relevant occurrences, as the risk of a product leaking was significant from the outset. | Clarification of what should be reported in accordance with RID is needed. Misunderstanding of reporting criteria is suspected notably the meaning of the term 'involvement' is unclear. |
| RID reporting aims | Clarified in UNECE/OTIF proposal, and clear for ERA as well. |
| Whether and how a link should be established between the existing and the newly proposed system | CSM ALSP will offer the possibility to connect other systems, mainly to avoid duplication of reports by operators and inconsistent reporting through different channels |

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| <p>ERA proposes a model for report on occurrences during the carriage of dangerous goods and the criteria for its preparation, which are based on the future EU CSM ASLP regulations; it covers dangerous goods and non-dangerous goods</p> | <p>The proposal is based on further improvement of the UNECE/OTIF working group. It is not a new ERA proposal, only improvement comments based on an existing proposal. CSM ASLP does not introduce new requirement on RID provision for reporting. It only proposes a better sharing of information.</p> |
| <p>The current proposal changes several criteria (e.g., personal injury) or comes up with new criteria (damage to objects, serious consequences, significant consequences) for estimating costs and estimating injuries.</p> | <p>These criteria are not new, they are the ones defined by Railway Safety Directive, since 2004. TDG is using the same infrastructure and shall also comply with RSD requirements, not only RID provisions.</p> |
| <p>All incidents or accidents involving the carriage of dangerous goods should now be reported, including incidents involving a person (suicide) while no dangerous goods are released or involved in the accident</p> | <p>This is incorrect understanding, CSM ASLP does not impose other reporting criteria than RID.</p> |
| <p>The question is whether all these criteria are necessary and should be involved in the report on occurrences, what is the added value of certain information, especially when it comes to learning from incidents.</p> | <p>CSM ASLP uses criteria that are not new, not affect RID criteria, and correspond to the Railway legislation on the reporting of incident.</p> |
| <p>there will be incidents that should be reported according to RID, and not from CSM ASLP, and vice versa</p> | <p>This is already the situation of today. ERA improvement proposal suggests discussing possible improvement.</p> |
| <p>A perspiring tank wagon in a large shunting area where no release of load is occurred and there is only condensation on the tank wagon. A necessary course of action is shutdown of the shunting process, evacuation of those present and then reconsidering of the situation. In that case the economic damage seems to rise quickly beyond €5.000, and the result is that this occurrence should be reported according to CSM ASLP, but not according to RID.</p> | <p>Strictly speaking perspiring is a release of material. It is an event strongly affecting railways which shall be reported in accordance with CSM ASLP. CSM will not require the TDG reporting according to RID as it is not requested by RID (not a release according to RID), however a RID report this may be voluntary added to the CSM report from the IM, to have a full picture of the problem.</p> <p>Question: if evacuation is required, should it not be reported in accordance with RID as well? Clarification is needed.</p> |
| <p>A tank wagon on a on side-track along the free railroad for a minor repair operation to prevent cargo release. There is a very limited impact on the timetable, because traffic does not have to be stopped. However, in this case, reporting would be required according to RID, but not according to CSM ASLP</p> | <p>This situation corresponds to CSM ASLP taxonomy 'A6.3 Dangerous goods occurrence not related to another type A event': A reporting of information in accordance with section 1.8.5 of 'RID' (as referred to in Annex II.1 to Directive 2008/68/EC, as amended) shall apply. To be clarified:</p> <p>- what RID criteria is applied in this case?</p> |
| <p>Regarding this issue the system in RID and CSM ASLP differ fundamentally. In RID the participant who is responsible for the load (loader, filler, carrier, unloader, consignee or railway infrastructure manager) is also responsible for reporting incidents to competent authority of the Contracting State.</p> | <p>CSMASLP not different than RID for the mandatory reporting. Operators responsible of the operation, meaning the carrier (RU), and IM shall report. In addition, the CSM entitles a voluntary report for interested parties.</p> <p>Filling/Loading/ Unloading is out of RSD scope and out of CSM ASLP scope. However, the ISS will allow for reporting in accordance with RID in case an operator/authority would like to benefit from this possibility.</p> |
| <p>However, in CSM ASLP the approach is that all participants who are involved shall supply information direct to ERA (or via the competent authority to the ERA) from their own perspective and independent of each other.</p> | <p>Mandatory for involved operators (RU/IM), meaning responsible parties. Other interested parties are not required to report. They may report if they have in interest in reporting.</p> <p>Report is made in the Information Sharing System to national authorities (NSA and TDG CA) and to ERA as</p> |

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| | <p>Railway authority for RU certificates and Vehicle authorisations within the EU.</p> |
| <p>In the ERA proposal in document INF.8, it appear that from CSM ASLP reference is made to RID on the data that should be reported. This seems to be a logical step, but the allocation of responsibilities from CSM ASLP ensures that different participants become responsible for reporting only some parts of the occurrence report form in RID.</p> | <p>RID requirement is unchanged by the CSM. Allocations of responsibilities is fully in line with RSD and unchanged.</p> <p>Current RID requirements are asking for elements that are in the scope of the RSD without being fully compliant with it (unclear definitions of some roles, type of railway occurrence, causes of railway occurrence). Issues come from RID which requires reporting of information already defined under RSD to the same operators. This is why a good coordination is required, at least within EU.</p> |
| <p>To avoid confusion and duplication of work (including the resulting inconsistencies), it is desirable to have common agreements for when incidents should be reported, by which participants it should be done (or leave room for coordination), and what information is requested regardless the systems</p> | <p>INF 8 is proposing such coordination which avoid any duplication from the operators.</p> <p>We can clarify this during the review of this document.</p> |
| <p>In our view the criteria for the preparation of a report on occurrences should undergo a critical review.</p> | <p>ERA is happy to have further critical review of INF.8 to correct any needed issue.</p> |
