

Position paper of the UIC Safety Platform on the brochure produced by DB, ÖBB and SBB on safety management in European railway companies

Introduction

At its meeting of 15.9.2004, the Platform asked the Harmonisation Group to draft an opinion on the contents of the brochure produced by the three companies DB, ÖBB and SBB and on its future usage.

The publication of the brochure comes at a time when DG TREN are preparing to set up a working party to put forward detailed proposals on the elements to be included in operators' Safety Management Systems (SMS) as foreseen by the Safety Directive and on the corresponding approval criteria.

The aim of this position paper is to introduce the brochure to readers outside the companies which produced it, place it in the European context and highlight the key aspects which may be useful for all, as well as any further information which appears necessary in the light of the legislation and other managerial practices before transforming the document into a "best practice guide" at European level.

Field of application

The brochure gives practical indications and recommendations for the organisation of operators' SMS in accordance with legal requirements, managerial practices and the culture of each operator.

The brochure was produced by three operators with an organisational structure integrating the functions of infrastructure manager and railway undertaking. Nevertheless, it should not be regarded as a document of relevance to historical, "integrated" companies alone. Each operator will be able to identify elements relating to their own activities, as well as the interfaces that it will have to manage together with other players involved in the railway system as a whole. Of course, operators using the document as a guide will be responsible for deciding whether each of the proposals represents the best way of meeting the demands of the Safety Directive in their specific situation.

The need for a common vocabulary

The brochure uses key safety management concepts drawn from common managerial practices some of which is found in European legislation. Yet a large number of these concepts are interpreted differently from one railway company to another and in the legislation of different Member States. In order to remove any ambiguity and practical difficulties which may result from these differing interpretations, it is vital to compile a glossary of terms used in railway management before any their use becomes more widespread.

Proof of risk management

As stressed in the brochure, the SMS must not remain a theoretical document, rather it must be possible to implement it on a daily basis. In particular, the risk analysis methods described in the SMS must not be theoretical but specific to the operator's reality and operating requirements.

Operators generally have two ways of demonstrating that their activities are safe:

They may carry out a risk investigation from scratch (ex nihilo) focusing on all their future activities, using RAMS tools. The investigation must then lead to measures intended to facilitate management of the identified risks. These measures consist first and foremost of implementing existing rules, because the operator functions in an integrated system governed by common rules and because the opening of

the market generally imposes additional regulations for ensuring compatibility and management of interfaces (cf. the aviation sector).

Another way of working, especially if the operator is new and has no experience, is to identify the rules and regulations they will have to apply in the context of the activity planned and to add to them according to their own organisation.

Both methods are equally valid provided that they are applied correctly and in their entirety. The first method is perfectly suited to the case of an operator introducing a sub-system or a new constituent. It may also be applied when an operator requests exemption from a regulation. The second method may bring parts of activities which are not managed (or managed inadequately) to light and lead the operator to carry out a risk analysis of these. Both risk analysis methods can generally only be applied to specific, identified objects which are limited in number.

Interface between infrastructure managers' and railway undertakings' SMS

This question is discussed in chapter 2.3 of the brochure, with reference in particular to the information which must necessarily be exchanged (cf. requirements f and g of Appendix III Safety Directive). This interface must function correctly in all Member States, since an SMS approved in one Member State is recognised as being valid in the others.

Allocation of resources

If the brochure is to be published at European level, the question of resources in general should be examined in more detail. Apart from specific questions on the funding of safety programmes or maintenance of staff competencies, the company must demonstrate that the necessary measures have been taken to ensure that the resources required to meet the conditions set when the safety certificate was granted are permanently available, for example ensuring on a daily basis the compliance of on-board equipment for a given railway.

Conclusion and proposals

The members of the Harmonisation Group have not found any information in this brochure contradicting their own safety management systems. The members therefore propose to submit the brochure together with the above comments, as well as the safety certificate benchmarking study approved by the Platform on 15.9.2004, to the working group under the "Article 21"-Committee which will be mandated by DG TREN to examine the approval process and cross-acceptance of part A of the SMS.

Based on the content of the document, the Harmonisation Group proposes to continue work on the following points:

- compilation of a glossary of harmonised terms for safety management,
- definition of guidelines for risk analysis methods and for identifying the objects to which they must necessarily be applied;
- drafting of proposals for harmonising the elements of the infrastructure manager/railway undertaking interface.