



European Commission - Mobility and Transport

Mr. Joachim Lücking, Head of Unit Rail Safety and Interoperability

Copy to:

European Union Agency for Railways (ERA)

Mr. Pio Guido, Executive Director ad interim

Brussels, 18 February 2025

Sector stakeholder view on the ERA CSM Review Vision Document received for RISC #104

Dear Mr. Lücking,

With this letter, AERRL, ALLRAIL, CER, EIM, ERFA, NB-Rail, UIP, UITP and UNIFE would like to share our views on the Common Safety Method (CSM) Review Vision Document recently received by DG MOVE from the European Union Agency for Railways (ERA) and on the agenda to be presented in the upcoming RISC #104.

First and foremost, we wish to reiterate our full support and commitment to all initiatives aimed at enhancing the overall safety performance of the Single European Railway Area. We fully acknowledge the importance of the CSM regulations as an important tool allowing to achieve ambitious safety targets.

Furthermore, we express our satisfaction with how the railway sector stakeholders have been consulted by ERA on this file to improve our knowledge and understanding of the detailed Agency's views and intents for the new revision of the CSMs. Many associations have actively participated to the set of workshops arranged by the Agency enabling insightful exchanges among the various stakeholders involved. As a next step, we understand that the CSM Review Vision Document prepared and issued by the Agency is intended to be used as an important input for the European Commission to formulate a clear and precise mandate for the upcoming CSM revisions according to Articles 6.2 and 6.5 of the Safety Directive (EU) 2016/798.

In this context, **the signatories of this letter wish to highlight the main recommendations expressed by the sector during the ERA workshops, for the further consideration of the European Commission**, which ultimately is responsible for defining a sound mandate as a crucial step forward.

- 1) We recommend **collecting more quantifiable data to support the Agency's findings arising from the 'quick scan'**. The identified 'areas for improvement' and related proposals should systematically be correlated to traceable findings and supported by root causes identification to **ensure a full adequacy and suitability of the envisaged regulatory changes**. This should be the responsibility of the future working parties tasked to define the CSM recommendations considering the opinions of users, national safety authorities and interested stakeholders including social partners, where appropriate.
- 2) We believe that a **more effective and increased CSM implementation** could be achieved by **developing appropriate sets of guidance and initiatives specifically tailored** to the risk profiles of the different railway actors in the form of workshops, application guides and harmonised templates.
- 3) Therefore, we believe there is **no need for a new CSM on Competence Management** as our existing framework appears suitable and sufficient. We **propose to establish common and detailed guidance outlining how Competence Management Systems shall be developed and maintained within the existing framework**. The reasoning of the Agency is that currently the setting up of systems of competence management in certain Member States are hindered by the national rules. This finding will not be solved by adding a new CSM Regulation but only by targeting those national rules.
- 4) **We do not support extending the current scope of CSM REA**, for example to cybersecurity, occupational health and safety or environmental risks. Nevertheless, in the upcoming revision, we see an **opportunity for streamlining the established process and applicable requirements** with the aim of easing and clarifying its application with the overall goal of increasing the overall CSM REA implementation. The need for harmonisation of the methods across the AsBo should be addressed, and therefore, recognition of the existing AsBo Cooperation should be part of the regulation itself.
- 5) Any potential mandate from the European Commission to the ERA for the review of the Common Safety Methods should **take into careful consideration the existing request to the ERA for the revision of the Technical Specifications for Interoperability (TSIs) and the resources of the ERA and Sector** already committed to these tasks.

We welcome the opportunity to exchange with DG MOVE on your views regarding the ERA CSM Review Vision Document and the timelines and expectations for a potential review of the CSMs. We propose to add this item to the agenda of the next meeting of the Network of Representative Bodies (NRB) scheduled for 20 March 2025, to exchange together and get a better understanding of the planning of the European Commission on this file.

Yours sincerely,



Association of European Rail Rolling
Stock Lessors (AERRL)



Community of European Railways and
Infrastructures Companies (CER)



European Rail Freight Association (ERFA)



International Union of Private Wagons (UIP)



The European Rail Supply Industry Association
(UNIFE)



The Alliance of Passenger Rail New Entrants
(ALLRAIL)



European Infrastructure Managers (EIM)



Notified Bodies Association (NB-Rail)



International Association of Public
Transport (UITP)