



European Commission - Mobility and Transport

Mr Joachim Lücking, Head of Unit - Rail Safety and Interoperability C4

Copy to:

European Union Agency for Railways (ERA)

Ms Oana Gherghinescu, Executive Director

Brussels, 16 December 2025

Sector stakeholder view on the forthcoming adoption of the CSM ASLP following the EC Expert Group meeting of 13 November.

Dear Mr Lücking,

Following the Expert Group meeting held by the European Commission on 13 November, the Associations (AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, NB-RAIL, UIP, UIRR, UITP Europe and UNIFE) would like to convey the Sector's consolidated position on the forthcoming adoption of the Common Safety Method for the Assessment of Safety Level and Performance (CSM ASLP).

First and foremost, the Associations reiterate their strong commitment to all initiatives aimed at enhancing the safety performance of the Single European Railway Area. We recognise the value of a coherent European safety-learning framework and welcome the opportunity for structured exchanges on the evolution of the CSM ASLP.

Across Member States, long-established reporting and data-analysis systems already operate with robust methodologies, reliable processes and proven analytical models, overseen by competent authorities. These systems form an essential cornerstone for effective safety learning and represent a mature foundation for any EU-level enhancement.

The discussions held on 13 November confirmed that the draft Act introduces new and demanding requirements in terms of reporting scope, timelines, data structures and the interconnection with the future Information Sharing System (ISS). Although it may be assumed that RU/IM are indeed already collecting the data as required by Railway Safety Directive and CSM Regulation on SMS, the draft CSM ASLP would lead to severe changes in companies' systems, processes and roles. The Commission seems to underestimate these differences in implementation.

To become proportionate, feasible and operationally sound, the future CSM ASLP should build on evidence, national and best-practice approaches, and ISS readiness, ensuring that obligations reflect today's state-of-play.

In this context, the Associations wish to highlight the following key recommendations for consideration by the European Commission prior to the adoption of the text:

- **Ensure that the new and demanding requirements introduced by the Commission are supported by an updated and comprehensive impact assessment.** This assessment should clearly identify the operational, organisational and economic implications for all actors, and demonstrate the proportionality, feasibility and added value of the proposed measures
- **Ensure close coordination and clear alignment with Member States that have established mature approaches for accident/incident reporting and data analysis.** As the main challenges introduced by the Act concern the scope of reporting, required content and associated timelines, drawing on existing national practices and widely recognised methodologies will help ensure that the CSM ASLP remains effective, proportionate and operationally realistic.
- **Enforce in the legal act that new reporting requirements apply only once the ISS has demonstrably reached operational readiness.** This includes achieving a stable, fully tested and user-validated system to ensure that all actors can comply reliably, efficiently and without operational disruption.
- **Adhere to the principle of “Report Once, Use Many” and ensure a coherent architecture at company, national and EU levels.** Full compatibility between existing national systems and the future ISS should be established as a prerequisite, supported by close alignment with NSAs and a harmonised architectural approach across all levels.
- **Strengthen the Safety Alerts module by introducing a robust process with clear priority criteria for submitting and resolving alerts.** Such criteria will enable RUs/IMs to prioritise submission and follow up on the most safety-relevant alerts, improving timely response, resource allocation and overall effectiveness.
- **As ISS data and effective Risk Control Measures (RCMs) vary according to the operational contexts of RUs/IMs and national frameworks, the Agency should reflect this diversity when proposing harmonised RCMs.** Flexibility for differentiated application should be ensured, based on a proportionate cost-benefit assessment.
- **Clarify all aspects related to the information collected in the ISS, including,**
 - the application of **just culture and liability protection to both individuals and organisations** providing information,
 - the **levels of access to information** provided amongst the different stakeholders and expectations regarding **its validation by National Safety Authorities,**
 - the **permissions and restrictions to review and amend information** uploaded by all impacted stakeholders of a given report
 - **further explanation of the calculations of the safety level** of an operator such that these calculations can be **practically applied** in the ISS.

The Associations remain fully committed to engaging constructively with DG MOVE, ERA and the Member States.

We believe that the adoption of the CSM ASLP can genuinely reinforce Europe's safety-learning culture provided that it remains proportionate, feasible, cohesive and grounded in proven operational practice.

Yours sincerely,



Association of European Rail Rolling
Stock Lessors (AERRL)



The Alliance of Passenger Rail New
Entrants (ALLRAIL)



Community of European
Railways and Infrastructures
Companies (CER)



European Infrastructure Managers
(EIM)



European Rail Freight Association
(ERFA)



European Federation of Museum
& Tourist Railways (FEDECRAIL)




Notified Bodies Association (NB-Rail)



International Union of Wagon Keepers
(UIP)



International Union of Combined
Road-Rail Transport Companies
(UIRR)



International Association of Public
Transport (UITP)



The European Rail Supply Industry
Association (UNIFE)