

Technical Specifications for Interoperability and OSE approves a project's main technical characteristics before the tender launch of a construction project, this process cannot automatically guarantee a safe integration of these technical systems into an operational context.

Besides, no evidence was transmitted to the Agency's assessment team that the Greek State takes responsibility to monitor and guide the overall development of railway safety following a system-based approach. This is not compatible with the Union legislation on railway safety and more precisely with Art 4 (1) a) and c) RSD, a fact which constitutes in the Agency's view a systemic deficiency.

Absence of common view on the main hazards and risks identified in the Greek Railway sector

The Agency's assessment team concluded that there is no common view among the railway entities on the main hazards and risks relevant for the Greek railway sector.

Besides, on the main risks presented by the Ministry, no tangible actions were presented during the on-site visit; initiatives were expected to be taken by either the IM or RAS. Nevertheless, some actions have been taken by RAS to enhance safety at level-crossings.

This is an indication of the absence of a system-based approach as required in the Union legislation on railway safety.

Alleged resources and underfunding of the IM jeopardise the implementation of Union legislation on railway safety

Most of the entities shared with the Agency's assessment team that there has been a lack of sufficient funding of the IM for several years. This element was reported as the main cause for poor maintenance and the consequent bad state of the infrastructure. This, allegedly, resulted to the degraded state of infrastructure and technical systems.

According to interviewed entities, this creates a situation in which operation relies mostly on the individual responsibility of operational staff. In doing so, safety relies only on pure rule compliance and does neither consider the difficult context in which the operations take place nor the limitations of human operators.

This situation constitutes in the Agency's view a systemic deficiency.

Implementation of CSM RA concerning safety independent assessment and the role of AsBo in the Greek railway system

In EU legislation on railway safety (in particular via the CSM RA), AsBos play a key role in the assurance of safety.

Some entities explained to the Agency that the CSM RA was not applied before 2018 in Greece. In addition, the CSM RA, as well as the role of NoBo and AsBo, are not clearly understood by the majority of the Greek railway entities. Important technical projects are hence considered in isolation, without formal evidence of safe integration (both at technical and operational level) and without a system-based approach.

It appears that lack of funding, combined with the absence of a risk-based approach to decision-making in the Greek rail sector has led to operational decisions with a potential impact on safety without considering the priority risks in the system and the related necessary risk control measures.

Both Greek AsBos interviewed still face challenges with their internal procedures on independent safety assessment. One AsBo was unable to demonstrate that its staff has sufficient competencies in the railway risk management area as required in point 1 in Annex II of CSM RA.