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regulatory
authority
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ANNUAL SAFETY REPORT | 2022

GREEK NATIONAL SAFETY AUTHORITY



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1. INTRODUCTION

- 1.1 Purpose, scope and recipients of the report
- 1.2 Main conclusions on the reporting year



1. Introduction

The 2022 Annual Report regarding the activities of the Greek National Safety Authority (NSA), the duties of which are performed by the Regulatory Authority for Railways (RAS), was prepared by the Railway Safety and Interoperability Unit (RSIU) of RAS.

The Annual Report was prepared in accordance with the “Issuing the [yyyy] NSA Annual Report” (GUI_MRA_002 V 3.0) guide, published by the European Railway Agency (hereinafter the “Agency”) and addressed to the NSAs. The report covers all the activities undertaken by RAS in the areas of railway safety and interoperability from 1 January to 31 December 2022 and is available in Greek and English on the following webpage: <http://ras-el.gr>.

For further clarifications, please contact us at: info@ras-el.gr.

1.1 Purpose, scope and recipients of the report

Article 19 of Directive (EU) 2016/798 on railway safety incorporated into the Greek Law by Article 71 of L.4632/2019 (A’ 159) requires the NSAs to publish an annual report every year regarding their activities during the previous year and to send it to the Agency by 30 September.

The annual report contains information on:

- 1) the development of railway safety, including an aggregation at Member State level of the CSIs pursuant to Article 5(1) of Directive (EU) 2016/798;
- 2) important changes in legislation and regulation concerning railway safety;
- 3) the development of safety certification and safety authorisation;
- 4) the results of, and experience relating to, the supervision of infrastructure managers and railway undertakings, including the number and outcome of inspections and audits;
- 5) the derogations decided in accordance with Article 15 of Directive (EU) 2016/798; and
- 6) the experience of railway undertakings and infrastructure managers on the application of the relevant Common Safety Methods (“CSMs”).

This report is intended to provide evidence of Greece’s ongoing efforts to harmonise with other EU Member States on the following topics:

- Improvement of safety performance;

- Progress in the development of interoperability.

Consequently, the purpose of this report is to inform any interested party and the Agency of RAS's activities on the development of railway safety & interoperability, demonstrating how RAS promotes the EU regulatory framework for railways, monitors the development of railway safety and the interoperability of the railway system in Greece, highlighting problems and good practices.

The structure and the content of this report are based on the Agency's Guide mentioned in the Introduction.

In accordance with Article 9(6) of Directive (EU) 2016/798, incorporated into Greek Law by Article 61 of L. 4632/2019, before 31 May every year, all Infrastructure Managers (IMs) and Railway Undertakings (RUs) shall submit to the NSA an annual safety report for the previous calendar year. The annual reports of railway agencies are an important source of information for this report.

This report covers the entire active railway system in Greece.

This report is available to:

- The Agency;
- The Greek National Safety Authority;
- Other NSAs;
- The Greek Ministry of Infrastructure & Transport;
- The National Organisation for the Investigation of Air and Rail Accidents and Transport Safety (EODASAAM/NIB).
- The Railway Operators in Greece are as follows:
 - Railway Undertakings [HELLENIC TRAIN, STASY, RAIL CARGO, PEARL & GFR]
 - Infrastructure Manager (OSE);
 - Company for Rolling Stock Maintenance (HELLENIC TRAIN, former EESSTY)
 - Conformity Assessment Bodies: Notified and Defined Bodies (NoBos & DeBos), Risk Assessment Bodies (AsBos)
- Any other interested party (i.e. passenger associations, e.t.c.)

The availability and publication of this report is ensured through the website of RAS at <http://ras-el.gr> and the ERADIS database of the Agency. A hard copy is also notified to the Minister of Infrastructure & Transport, to the Deputy Minister of Infrastructure &

Transport, and to the Secretary General for Transport of the Ministry of Infrastructure & Transport and to all the above interested parties.

1.2 Main conclusions on the reporting year

RAS operates as an Independent Administrative Authority pursuant to its Internal Rules of Operation and Management, which were approved by Joint Ministerial Decision (JMD) Δ4δ/οικ.89995 / 15--11--2018 (B' 5781). In accordance with said JMD, RAS's organisational structure includes RSIU (the Rail Safety and Interoperability Unit) which is organised into two Departments: the Rail Safety Department and the Interoperability Department. At the end of 2022 seven (7) employees were exclusively employed in RSIU.

The RSIU implements the tasks of the NSA arising in particular out of Law 4632/2019 (A' 159), Law 4199/2013 (A' 216), Law 3911/2011 (A' 12) as applicable, and from the respective European legislation on railway safety and interoperability. Furthermore, the RSIU performs the duties of the Rules' "Competent Authority" in relation with the international carriage of dangerous goods by rail (RID) of JMD No. Γ5/145078/03-06-2021 (B' 3202).

RAS's organisational framework is outlined with further detail in section 3.4 hereof.

The Management Board of RAS is made up of 5 members. The Chairman, the Vice-Chairman and three (3) regular members, substituted by three (3) substitute members. This Administration was appointed in July 2017 and continued performing its duties throughout 2022.

RAS continued focusing on the application of legislative and regulatory changes and requirements, such as L.4632/2019 (A'159) about the harmonisation with the Guidelines of the technical pillar of the Fourth Railway Package, MD ΑΣ10/77243/580/13-02-2019 (B' 698 / 01-03-2019) about the amendment of the General Traffic Regulation (GKK) – Part B' Traffic and Manoeuvre Regulation etc. Following the issuance of Regulation (EU) 2015/995 (TSI OPE), the start of implementation of the revised GKK and the issuance of the first Rule Books of the RU, changes have been made with regard the responsibilities of the bodies involved in the conduct and management of train traffic, which are main components of safety management.

In 2022, RAS continued performing its main, at least, duties detailed in paragraph 2, article 16 of the Directive on railway safety which was transposed into national law with article 68, Law 4632/2019.

Furthermore, RAS continued performing the duty of supervising the RUs and the IM in accordance with the relevant regulatory framework, undertaking a series of railway operator supervision activities, in accordance with the relevant annual Supervision Plan. In 2022, thirteen (13) out of eighteen (18) scheduled supervision activities were performed.

Under Decision No 939/01-04-2022 (B' 1904/18-04-2022) which redefined the qualifications, and the terms and conditions for recognising the examiners of train drivers and candidate train drivers, RAS continued granting recognitions/renewals of examiners and publishing the Recognised Train Driver Examiner and Candidate Train Driver Register on its webpage. The same applied to the cases of granting/renewal of certification of adequacy for trainers of train drivers and candidate train drivers under RAS Decisions No 7690/11-05-2018 (Gov. Gaz. B' 1691) & 8664/01-10-2018 (Gov. Gaz. B 4687/18-10-2018), as well as granting/renewal of recognition of medical doctors whose task is to perform medical examinations of train drivers and candidate train drivers pursuant to JMD ΑΣ19/38259/1879/10.10.2016 (B' 3242) "On the regulation of medical issues regarding the certification of candidate train drivers and train drivers" and the Call for Expression of Interest with Reg. No 5417/06-02-2017 for the participation in the medical doctor recognition procedure and in their inclusion in the Recognised Medical Doctor Register, which is kept and published by the Authority.

In 2022, RAS as a competent authority for the implementation of Law 3911/2011 continued the issuance of European train driver licenses in accordance with the template in the Appendix of Regulation (EU) 36/2010. Said licenses are printed by the Hellenic National Passport and Secure Document Centre of the Headquarters of the Hellenic Police (DDEA) in accordance with the provisions of JMD ΑΣ19/1052/14 / 20- -07- -2018 (B' 3089). With regard to the training of candidate train drivers, in 2022 the OSE training centre submitted, under Article 23, L. 3911/2011, two (2) updated Training Programmes related to the train driver certificate. The Railway Safety Department reviewed the submitted programmes which were approved by RAS Plenary Decisions No. 699/ 09-03-2022 and 3054/ 24-10-2022.

In autumn 2022, examinations for candidate train drivers were held, in accordance with the No. 10720/18-07-2019 (B' 2962) RAS decision on the "Procedure for acquiring a train driver license – Organisation and definition of the process of examination to obtain a train driver license." Theoretical and practical examinations took place on 05-09-2022 & 06-09-2022 and on 12-09-2022 & 13-09-2022 at the OSE vocational training centre and at the Services in the Athens-Lianokladi and Thessaloniki-Katerini parts, while seventy three (73) candidate train drivers of HELLENIC TRAIN RU took part at the examinations.

Furthermore, repeat examinations for the theoretical part took place on 23-11-2022 at the OSE vocational training centre for two (2) candidates that had failed the initial examination.

As regards important common safety indicators, in 2022 there were 19 significant accidents (increased in relation to 2021 - 14 accidents), while the average for the last five years was 16.8 accidents. In 2022, the average increased by 35.7% compared to incidents in 2021 and by 13.1% compared to the average for the last five years.

It is noted that in 2022 10 fatalities were recorded (6 fatalities in 2021), while the average of the last five years is 9.4. This index also increased by 66% compared to the previous year and increased slightly compared to the average of the last five years.

The number of significant accidents recorded in 2022 was higher compared to 2020 & 2021 and returned to pre-Covid levels.

2. SUMMARY IN ENGLISH



2. SUMMARY IN ENGLISH

The duties of the Greek National Safety Authority (NSA) are performed by the Regulatory Authority for Railways (RAS). The 2022 Annual Report was prepared by Railway Safety and Interoperability Unit (RSIU) of RAS in accordance with the “Issuing the [yyyy] NSA annual report” (GUI_MRA_002 V 3.0) Guide and the article 19 of the Railway Safety Directive (EU) 2016/798 transposed into Greek law with article 71, Law 4632/2019 (A’ 159). The purpose of this report is to inform any interested party and the Agency of RAS’s activities on the development of railway safety & interoperability, demonstrating how RAS promotes the EU regulatory framework for railways, monitors the development of railway safety and the interoperability of the railway system in Greece, highlighting problems and good practices.

The availability and publication of this report is ensured through the RAS website at <http://ras-el.gr> and the ERADIS data base of the Agency.

RAS operates as an Independent Administrative Authority in accordance with its Internal Rules of Procedure, which were approved by Joint Ministerial Decision (JMD) No. Δ4δ/οικ.89995 / 15-11-2018 (B’ 5781). In accordance with said JMD, RAS’s organisational structure includes the RSIU, which is organised into two Departments: the Railway Safety Department and the Interoperability Department. In 2022, seven (7) employees were employed exclusively at the RSIU.

The RSIU implements the functions of the NSA arising from Law 4632/2019 (A’ 159), Law 4199/2013 (A’ 216), Law 3911/2011 (A’ 12) as applicable, and from the respective European legislation on railway safety and interoperability. Furthermore, the RSIU performs the duties of the “Competent Authority” of the Rules in relation to the international carriage of dangerous goods by rail (RID) of JMD No. οικ. Γ5/48222/2474 / 21-06-2019 (B’ 2755). Recently, the new JMD for RID 2021, i.e. JMD No Γ5/145078/03-06-2021 (B’ 3202) was published in the Government Gazette.

RAS’s organisational framework is outlined with further detail in section 3.4 hereof.

RAS was in collaboration with the Ministry of Infrastructure and Transport for the compliance of Railway Undertakings (RU) with the overall changes. Also, RAS informed the RUs about their obligations and responsibilities undertaken by the RUs to perform activities.

In 2022, RAS continued performing its main, at least, duties detailed in paragraph 2, article 16 of the Directive on railway safety.

RAS continued performing the RU and IM supervision duty in accordance with the relevant regulatory framework, in accordance with the relevant annual Supervision Plan.

Under Decision No 939/01-04-2022 (B' 1904/18-04-2022) which redefined the qualifications, and the terms and conditions for recognising the examiners of the train drivers and candidate train drivers, RAS continued to grant examiner recognition/renewal and to publish the Recognised Train Driver Examiner and Candidate Train Driver Register on its website. The same was true for the case of granting adequacy certification for train driver trainers and candidate train drivers under Decisions No 7690/11-05-2018 (ΦΕΚ Β' 1691) & 8664/01-10-2018 (ΦΕΚ Β 4687/18-10-2018), as well as granting recognition for doctors undertaking the medical examination of train drivers and candidate train drivers under Decision K.Y.A. ΑΣ19/38259/1879/10.10.2016 (B' 3242) and Invitation to Expression of Interest No 5417/ 06-02-2017 (RAS).

Within 2022, RAS being the competent authority for the implementation of Law 3911/2011 continued issuing the “European” train driver licenses in accordance with the Annex to Regulation (EU) 36/2010. In autumn 2022, examinations for candidate train drivers were held in accordance with decision No 10720/18-07-2019 (B' 2962) – RAS decision on the “Procedure for acquiring a train driver license – Organisation and definition of the process of examination to obtain a train driver license.” 73 train driver candidates of the HELLENIC TRAIN RU participated in the train driver license exams held on 05 and 06-09-2022, 12 and 13-09-2022 and 23-11-2022.

As regards important safety indicators, in 2022 there were 19 significant accidents (increased in relation to 2021 when the corresponding number was 14). 10 fatalities were recorded, while the fatalities recorded in 2021 were 6.

3. NSA SAFETY STRATEGY, PROGRAMMES, INITIATIVES AND ORGANIZATIONAL FRAMEWORK

- 3.1 Strategy and activity planning
- 3.2 Safety Recommendations
- 3.3 Safety measures implemented in addition to the recommendations
- 3.4 Organizational Context of Safety



3. NSA SAFETY STRATEGY, PROGRAMMES, INITIATIVES AND ORGANIZATIONAL FRAMEWORK

3.1 Strategy and activity planning

One of the most significant goals of the Ministry of Infrastructure and Transport (MIT) is to continuously improve the safety level of Greek railways and therefore to improve significant CSIs. To this end, the main concerns are the completion and placing into service of the new infrastructure projects including modern systems (i.e. ERTMS), the development of a safety culture, the reduction of serious accidents, the implementation of Law 4632/2019 (Incorporation of the technical pillar of the Fourth Railway Package into the Greek Law) the implementation of the revised General Traffic Regulation (GKK) – Part B’.

In this context, in 2022, RAS designed and carried out the following activities / initiatives:

- RAS continued performing supervision activities, pursuant to the annual Supervision Plan and the approved Supervision Strategy, in targeted sectors. In accordance with the Strategy, the supervision principles are the principle of proportionality between enforcement and risk, the principle of consistent approach, the principle of targeting and priority setting for supervisory activities, the principle of transparency, the principle of accountability for decisions or actions, the principle of cooperation with other railway NSAs and with competent authorities, and the principle of information. For this reason, RAS scheduled supervisory actions to verify the implementation of legislative and regulatory changes and requirements, such as L.4632/2019 (A’159) on the harmonisation with the Guidelines of the technical pillar of the Fourth Railway Package, MD ΑΣ10/77243/580/13-02-2019 (B’ 698 / 01-03-2019) about the amendment of the General Traffic Regulation (GKK) – Part B’ Traffic and Manoeuvre Regulation etc., the implementation of the relevant Common Safety Methods (CSMs) of Article 6, Directive (EU) 2016/798, as well as the promotion, by means of company SMSs, of safety culture within railway agencies under Directive (EU) 2016/798
- RAS continued monitoring railway incidents and accidents on the national railway network to draw conclusions on the overall safety level of the national railway network, as well as supervising railway operators in targeted fields/areas.
- RAS continued receiving train monitoring Reports for HELLENIC TRAIN RU trains on a monthly basis in order to monitor train driver compliance with speed limits.
- RAS, in cooperation with the “Panos Mylonas” Road Safety Institute, participated in the events of the “International Level Crossing Awareness Day (ILCAD 2022)”, which

was held on 09 June 2022 and is organised by the International Union of Railways (UIC). RAS and the Panos Mylonas Institute issued a joint press release and produced a poster. The organisers of the 14th International Level Crossing Awareness Day (ILCAD) developed three new documents with safety advice for pedestrians, cyclists and electric vehicle users and for persons with reduced mobility. The core of the ILCAD campaign, the essential reason for its existence, is to disseminate to as many recipients as possible the main and crucial messages about the attention required at level crossings, in order to promote safety for all.

3.2 Safety Recommendations

The Railway Accident and Incident Investigation Committee established under article 2, law 4313/2014 (A' 261) has not been activated for the time being. Therefore, no safety recommendations were issued during 2022.

3.3 Safety Measures Implemented

3.3.1 Supervision Activities/Interventions

During 2022, RAS monitored the implementation of the measures below, as corrective actions by the Railway Operators following Non-Compliances (NC) & Improvement Suggestions (IS) identified/proposed by RAS:

- Updating the PRO-011 - INTERNAL SAFETY INSPECTIONS Procedure/ paragraph 2 of the SMS of HELLENIC TRAIN RU in the context of RU's application for the issuance of a single safety certificate (NC -16.1).
- Scheduling of a Safety Review by the Management within the first quarter of 2023 by HELLENIC TRAIN RU (NC - 16.2).
- Development of an intranet platform to make available to all Civil Security staff the Procedures of the Safety Management System by HELLENIC TRAIN RU (IS - 16.1).
- Updating the Tables (A1, A2, B) matching compliance with national rules by GFR RU (NC- 1.1).
- Attaching the Journey Form to the Train Driver Manual as a model sample by GFR RU (NC - 1.2).
- Appointment of the person in charge of performing the calculations and the braking test procedure by GFR RU (NC - 1.3).

- Drafting a detailed procedure by the GFR RU for the issuance of a supplementary train driver certificate (training, examinations, etc.) (NC - 1.4).
- Drafting detailed Contingency Plans by GFR (NC - 1.5).
- Drafting the annual internal SMS inspection programme for 2023 as a requirement for the "SMS Internal Inspections" SM-09 (ΔΑ-09) safety management procedure by GFR RU (NC-1.6).
- Approval and submission to RAS of the updated SM-09 (ΔΑ – 04) safety management procedure outlining in detail the examination procedure organised by the RU for the acquisition of train driver certificates by STASY RU (NC-7.1).
- Drafting of the annual internal SMS inspection programme and the relevant reports for 2022 as a requirement for the "SMS Internal Inspections" ΔΑ-09 procedure by STASY RU (NC-7.2).
- Review by the administration and drafting of the relevant minutes as a requirement of the SM -10 (ΔΑ-10) procedure "SMS review by the Administration" by STASY RU (NC-7.3).
- Refresher training in the SMS of the RU to personnel performing crucial tasks, pursuant to the latest version of the ΔΑ-04 by STASY RU (NC-7.4).
- Keeping of a list with the employees performing crucial tasks related to safety in order that their refresher training may be controlled by STASY RU (IS-7.1).
- Keeping an electronic Register of trainees (candidate particulars, start and end dates of theoretical & practical trainings etc.) by the OSE Vocational Training Centre (NC-13.1).
- Examining the possibility of setting a maximum number of trainees per training programme series by the OSE Vocational Training Centre (IS-13.1).
- Examining the possibility of certifying additional instructors in particular in subject matters involving several hours of teaching (General Traffic Regulation, Signalling Regulation) by the OSE Vocational Training Centre (IS-13.2).
- Issuing certificates for the 9 tower cranes at the PIRAEUS Plant (EU) 2019/779, Annex II, IV.4) by HELLENIC TRAIN as an ECM (NC-1.1).
- Updating the table that includes other equipment and tools for safe maintenance ((EU) 2019/779, Annex II, IV.4) by HELLENIC TRAIN as an ECM (NC-1.2).
- Creating a shared file at the company's intranet in order to make available to all employees all the documents of the Rolling Stock Safety Management System (RSSMS) by HELLENIC TRAIN as an ECM (IS-1.1).

3.3.2 Interventions following complaint investigation

The Regulatory Authority for Railways, in the context of its responsibilities as the National Safety Authority (Railway Safety Authority), received the following complaints/letters that led to interventions and to taking suitable measures:

1. HELLENIC TRAIN RU train driver certification examinations.

RAS received an anonymous complaint that, from 14 to 17 November 2022, HELLENIC TRAIN RU conducted examinations in which an examinee was deemed successful without having participated in the exams. Additionally, according to the same complaint no control was conducted regarding the observance of safety measures against the Covid 19 pandemic.

RAS sent a letter to the RU requesting its opinion on the above complaint in writing together with relevant information. The RU answered by sharing all the requested data and confirmed that all examinees were present during the examinations without exceptions and that during the whole duration of the examination in driving both the candidate train drivers and the examiners were wearing masks and observing the necessary measures in order to prevent the Covid 19 virus dissemination. The Authority has attempted to contact the complainant asking for additional data and evidence regarding the complaint, but this was not possible. Following the above the case was closed.

2. A complaint by a train driver of the RAIL CARGO Railway Undertaking referring to locomotives manned with one train driver and one under certification, contrary to the provisions of L. 3911/2011, due to insufficient locomotive personnel with the RU, submitted to RAS in 2021.

In the context of the complaint investigation, a findings report was prepared in 2022 by the appointed RAS committee, and relevant actions are expected.

3. A complaint regarding the derailing of two wagons of freight trains in the area of Serres on 25/08/2021. This accident specifically regarded the derailing and overturn of two tank cars of freight train No 80610 with thermal traction unit MLW/504+509 at the 173+700 kilometre location of the Thessaloniki-Alexandroupoli line and the subsequent leakage of 5,400lt (or 4,401kg) of oil fuel.

In 2022, RAS decided to perform an ex officio examination by the Authority regarding the incident, in accordance with Article 5(2) of the Hearing Regulation of RAS (RAS Decision No 1020/09-06-2021-Gov. Gaz./B/2913/05.07.2021). The investigation's specific scope (Article 5(3), of the above mentioned Regulation) is the audit of

compliance with regulations, with railway legislation provisions and with the requirements of the relevant Safety Management System (SMS) of TRAINOSE RU with regard to railway transfer safety, based on indications and evidence held by the Authority. The relevant investigation was decided to be performed by officers of the competent Rail Safety & Interoperability Unit (RSIU) of RAS, in accordance with RAS's Regulations of Internal Operation and Management. Following the end of the examination, a findings report was drafted for the launch of the hearing process, in application of Article 5(5) of the Hearing Regulation of the Regulatory Authority for Railways.

4. Complaint by PES OSE regarding the breach of Article 983.1 of the GKK. According to the complaint, trains depart from the closed R.S. of Volos without the crew having been informed, through a signed document, about the traffic documents, given that while they remain in the closed R.S. of Volos the locomotive and accompanying staff change.

The relevant investigation was decided to be performed by officers of the Rail Safety & Interoperability Unit of RAS (RSIU) and following the completion of the examination, a findings report shall be drafted on the launch or not of the hearing process, in application of Article 5(5) of the Hearing Regulation of the Regulatory Authority for Railways (RAS Decision No. 1020/09-06-2021, Gov. Gaz. /B/2913/05.07.2021). A findings report was drafted proposing said complaint to be closed, by decision of the RAS plenary, in application of Article 6(3) of the Hearing Regulation of RAS, given that upon examination of the submitted data, the RSIU officers found that there is no breach of Article 983.1 of the General Traffic Regulation (GKK) - Train traffic on an unstaffed open line branch.

5. PEPE has sent the following letters to RAS regarding:

- An incident at the Florina-Thessaloniki line.

PEPE notified to the Regulatory Authority for Railways the incident below and the following information:

- Cancelling of train 3741, on 10-01-2022, at 04:35 and of first service from Thessaloniki to Florina, due to the refusal of the train driver to set off because the line had not been inspected by the competent crew after the 09-01-2022 earthquake in the area of Florina.
- Closing of the line and extraordinary inspection for landslides following the train driver's refusal to set off and subsequent cancellation of the service.

In the context of performing its supervisory activities, RAS asked OSE RU to notify RAS about its actions related to the above incident (in detail), as well as about its opinion regarding the foregoing, as regards OSE RU's task performance, especially those stemming from the General Traffic Regulation - Part B.

OSE RU sent a letter of reply to RAS. The Authority, taking into consideration the data presented by OSE, sent PEPE a letter, thus completing the correspondence regarding the incident.

- OSE RU circular 9036936/25-08-2022.
PEPE informed RAS about an issue regarding the traffic safety related to the OSE RU's circular with Reg. No 9036936 setting out guidelines about the traffic between the stations of LEIVADIA and OINOI from Thursday 15-08-2022 until Wednesday 31-08-2022, from 18:00 to 8:00 of the next day due to works in progress. RAS asked for information from OSE regarding the aforementioned circular and OSE sent a letter informing the Authority about all concerns raised. The Authority sent the RU's letter to PEPE for its information and the correspondence regarding this matter was completed.
 - Finally, the correspondence with PEPE that had started last year continued regarding the Edessa safety key in the outside position, by the Infrastructure Manager IM and its permanent arrangement at the bypass. RAS informed PEPE about the opinions of the competent divisions of OSE.
6. PEPT requested clarifications from RAS related to Article 109 of the General Traffic Regulation, on the staffing of Trains with Train Traffic and Control Personnel.
RAS informed PEPT that RU personnel carrying out crucial safety tasks related to the “accompanying of trains” needs to have the required professional competence and to comply with medical and other requirements, in accordance with the provisions of Implementing Regulation (EU) 2019/773 and of the relevant Safety Management System (SMS) of the RU.
7. The Panhellenic Federation of Railway Employees (POS) sent RAS a letter related to the review of the matter so that the existing license be converted into a European train driver license for train drivers of OSE.
RAS informed POS that their request for the conversion of existing licenses and other Railway Line Vehicle (SOG) drivers of OSE, with different terms than the ones set out in the relevant legal documents mentioned in its letter, requires the amendment of said legislative acts.

3.3.3 Ex officio investigations

The Regulatory Authority for Railways, in the context of its responsibilities as the National Safety Authority (Railway Safety Authority), performed the following ex officio investigations:

1. Performance of ex officio investigation regarding the incident of a collision between a passenger train and a pulling locomotive on 24-01-2022.

RAS decided to perform an ex officio investigation regarding the incident, in accordance with Article 5(2) of the Hearing Regulation of RAS (RAS Decision No. 1020/09-06-2021, Gov. Gaz. B/2913/05.07.2021). The investigation's specific subject (Article 5(3), of the above Regulation) was:

- The examination of the extraordinary, preventive measures taken by the Infrastructure Manager (IM) and the Railway Undertaking (RU) against the “ELPIDA” storm.
- Verification of compliance with regulations, with provisions of railway legislation and with the requirements of the relevant Safety Management System (SMS) of TRAINOSE RU with regard to railway transfer safety, based on indications and evidence held by the Authority.
- Verification of the implementation or not of the actions provided in the Crisis Management Plan (CMP) by the IM and the RU personnel, to respond to the emergency caused by the I/C 54 train immobilisation and collision with a pull locomotive, as well as the consequent injury of passengers.

The relevant investigation was decided to be performed by officers of the competent Rail Safety & Interoperability Unit (RSIU) of RAS, in accordance with RAS's Regulations of Internal Operation and Management. Following the end of the examination a findings report was prepared for the purpose of launching the hearing process for the HELLENIC TRAIN SA Railway Undertaking and OSE SA Infrastructure Manager, in application of Article 5(5) of the Hearing Regulation of the Regulatory Authority for Railways. Subsequently, a Hearing took place and, by a Decision of RAS's plenary, sanctions were imposed to HELLENIC TRAIN RU and OSE IM. In particular, a fine of €98,000 in total was imposed to the Infrastructure Manager for (I) the detected violations of Articles 127 (Train immobilised on the open line - Help) and 134 (1344)(d) (Line not accessible due to snow) of the General Traffic Regulation - Part B (Traffic and Manoeuvre Regulation) and (II) for the detected violation related to its non-compliance with the requirements of Procedure C (3.2) “Description of actions in case of line

interruptions due to extreme weather events and/or Train entrapment” of the General Crisis Plan of the relevant Safety Management System (SMS), and a fine of €100,000 in total was imposed to the HELLENIC TRAIN Railway Undertaking (I) for the detected violation of Articles 123 (Unforeseen train stop - Coverage) and 127 (Train immobilised on the open line - Help) of the General Traffic Regulation - Part B (Traffic and Manoeuvre Regulation) and (II) for the detected violation related to its non-compliance with the requirements of the “Safety Management Procedure – Propelling Unit Course Monitoring Control” of the relevant Safety Management System (SMS) and (III) for the detected violation related to failure to produce the data asked by the Authority.

2. Performance of an ex officio investigation about the incident of the immobilisation of the ETR-ICE 60 train, during the service from Athens to Thessaloniki, on 28-07-2022 and the subsequent elimination of certain routes.

RAS decided to perform an ex officio investigation of the incident, in accordance with Article 5(2) of the Hearing Regulation of RAS (RAS Decision No. 1020/09-06-2021, Gov. Gaz. B/2913/05.07.2021). The investigation's specific subject (Article 5(3), of the above Regulation) was:

- Verification of compliance with regulations, in particular with the General Traffic Regulation (GKK) - Part B, with the remaining relevant provisions of railway legislation, and with the requirements of the relevant Safety Management Systems (SMS) of OSE IM and HELLENIC TRAIN RU, with regard to railway transfer safety.
- Verification of the implementation/observance of the actions provided for in the Crisis Management Plan - CMP, by the competent personnel of the IM and of the RU, in addressing said incident.
- Verification of compliance with provisions stemming from Regulation (EU) 1371 of the European Parliament and of the Council of 23 October 2007 “on rail passengers' rights and obligations” by OSE IM and HELLENIC TRAIN RU and in particular of provisions related to travel information, refund and re-routing, compensation of the ticket price, assistance provided, the service quality standards of the Quality Management System, etc.

The relevant investigation was decided to be performed by officers of the competent Rail Market Regulation and Audit Units (MRESA) and of the Rail Safety & Interoperability Unit (RSIU) of RAS, in accordance with RAS’s Regulations for Internal Operation and Management.

Following the end of the investigation a findings report was prepared proposing the launch of the hearing process for the HELLENIC TRAIN SA Railway Undertaking and OSE SA Infrastructure Manager, in application of Article 5(5) of the Hearing Regulation of the Regulatory Authority for Railways.

3. Ex officio investigation for the incident during the 1521 train service from Lianokladi to Athens on 01-08-2022.

RAS decided to perform an ex officio investigation on the incident (immobilisation of train 1521 following a collision with an animal standing on the line and derailment of the train during its entrance at the Tithorea train station at the first change of track) according to Article 5(3) of the Hearing Regulation of RAS (RAS decision 1020/09-06-2021 - Gov. Gaz. /B/2913/05.07.2021). The investigation's specific subject (Article 5(3), of the above Regulation) was:

- Verification of compliance with regulations, in particular with the General Traffic Regulation (GKK) - Part B, with the remaining relevant provisions of railway legislation, and with the requirements of the relevant Safety Management Systems (SMS) of OSE IM and HELLENIC TRAIN RU, with regard to railway transfer safety.
- Verification of the implementation/observance of the actions provided for in the Crisis Management Plan - CMP, by the competent personnel of the IM and of the RU, to address said incident.
- Verification of compliance with provisions deriving from Regulation (EU) 1371 of the European Parliament and of the Council of 23 October 2007 “on rail passengers' rights and obligations” by OSE IM and HELLENIC TRAIN RU.

The relevant investigation was decided to be performed by officers of the competent Rail Market Regulation and Audit Units (MRESA) and of the Rail Safety & Interoperability Unit (RSIU) of RAS, in accordance with RAS’s Regulations for Internal Operation and Management. Following the end of the investigation, a findings report was prepared suggesting not to launch the hearing process for the HELLENIC TRAIN SA Railway Undertaking and OSE SA Infrastructure Manager.

3.3.4 Interventions / Issuance of recommendations

The Regulatory Authority for Railways, in the context of its responsibilities as the National Safety Authority (Railway Safety Authority), issued the following recommendations:

1. Approval of issuance of a guideline/recommendation regarding the staffing of propelling units during the practical training of candidate train drivers in driving in order to acquire a train driver certificate.

PEPE with a letter to RAS requested a confirmation that during the training of train drivers - holders of the European license for acquiring a type B certificate, the thermal traction unit and electric traction unit must be manned with 2 certified train drivers (type B certificates) one of whom should be a certified instructor with the register kept by the Regulatory Authority. Following the above letter, RAS issued the recommendation below:

“The provision of article 4.2e) of L.3911/2011 does not refer to freight transfer, but regards purely training routes.

Therefore, the provision of article 4.2e) of L.3911/2011 clearly refers only to train driver training and not to commercial services. In any case, the provisions of Decision No. ΑΣ10/77243/580 “Amendment of the General Traffic Regulation (GKK) – Part B’ (Traffic and Manoeuvre Regulation) (Gov. Gaz. 698/B/01.03.2019) GKK in case of unclear wording should be interpreted restrictively, in accordance with the best possible protection of rail transfer safety.

In summary, the driving cabins of real commercial trains that are also used for the training of train drivers must be manned by two (2) licensed and certified train drivers (one of whom must be a certified instructor) and one (1) trainee, that is three (3) people in total”.

2. Approval for the issuance of a guideline/recommendation regarding the staff of the Entities in Charge of Maintenance and/or other railway entities performing specific activities exclusively within the rolling stock maintenance areas. According to the above recommendation:

- ECM staff and/or, generally speaking, rail entities’ staff performing the “Driving of propelling rolling stock” activity exclusively on lines situated inside railway repair workshops, locomotive depots or sheds, and private branch lines or sidings does not fall within the scope of L.3911/2011 (A’ 12)
- ECM staff and/or, generally speaking, rail entities’ staff performing the “Track change operation” activity, exclusively on lines situated inside railway repair workshops, locomotive depots or sheds, and private branch lines or sidings does not fall within the scope of the Implementing Regulation (EU) 2019/773 as personnel with crucial safety responsibilities, of the General Traffic Regulation (GKK) - Part B’ (Traffic and Manoeuvre Regulation) (B’698/2019) and of Article 65, L.4632/2019 (A’159).

- The above staff performing the above activities comes under the Competence Management system [Requirement/Assessment criterion of Article 6, Annex II, Implementing Regulation (EU) 2019/779], which is included in the relevant Maintenance (Management) System.
- The initial/continuous training of the above staff may be held at the OSE training centre or alternatively come under the responsibility of the ECMs and follow the approved procedure for the Maintenance (Management) System concerned.

3.4 Organizational Context of Safety

In 2022 the national organizational framework in Greece as regards railway safety is as follows:

- The Ministry of Infrastructure & Transport is the legislative authority responsible for the railway sector in Greece. OSE and ERGOSE operate under its supervision.
- RAS is an Independent Administrative Authority performing, among others, the duties of Greek NSA, in accordance with L. 4199/2013 and L. 4632/2019.
- The Railway Accident and Incident Investigation Committee is an Independent Administrative Authority established under Article 2, L.4313/2014 (A' 261) in order to perform the duties of the National Investigation Body of Article 22 of Directive (EU) 2016/786. This particular Committee was not active in 2022 while with L.5014/2023 the National Organisation for the Investigation of Air and Rail Accidents and Transport Safety (EODASAAM/NIB) was established, to which the responsibilities of the above committee were transferred.
- OSE is the sole national railway infrastructure manager, holder of a valid safety authorization, operating in Greece under the supervision of the Ministry of Infrastructure and Transport. OSE is also the owner of the only recognized Train Driver and Candidate Train Driver Training Centre.
- ERGOSE S.A., an entity supervised by the Ministry of Infrastructure & Transport, is responsible for implementing the Investment Programme and the management of new rail infrastructure projects.
- There are four (4) licensed Railway Undertakings (RUs) holding a single safety certificate, as follows:
 - STASY, a public RU within the Superfund providing only passenger services, including high-speed services, safety certified (Single Safety Certificate), in operation;

- HELLENIC TRAIN (former TRAINOSE) – Member of the Ferrovie Dello Stato Italiane S.p.A. Group, a private RU providing passenger services, including high-speed services, and freight services, including carriage of dangerous goods services, holds a single safety certificate, and is in operation;
- RAIL CARGO LOGISTIC GOLDAIR, a private RU for freight transfer, including carriage of dangerous goods services, holds a single safety certificate and is in operation.
- GFR, a private Romanian RU providing freight services, carriage of dangerous goods included, is Safety Certified (certificate issued by ERA in April 2020) in accordance with Article 10 of Directive (EU) 2016/798. GFR started operating in the Greek railway network in 2022.
- PEARL, a private licensed RU providing freight services, which does not hold a single safety certificate and has not started its operation yet.
- HELLENIC TRAIN, additionally to the performance of its transport activity as a RU, is also an Company for Rolling Stock Maintenance, holding a valid ECM certificate .
- GAIA OSE S.A. is a public enterprise, holder and manager of the existing national rolling stock, under the supervision of the Superfund.

See below the organizational chart of RAS and a table with information on the personnel of the Rail Safety & Interoperability Unit (RSIU) of RAS in 2022.

Chart 1: RAS organizational chart

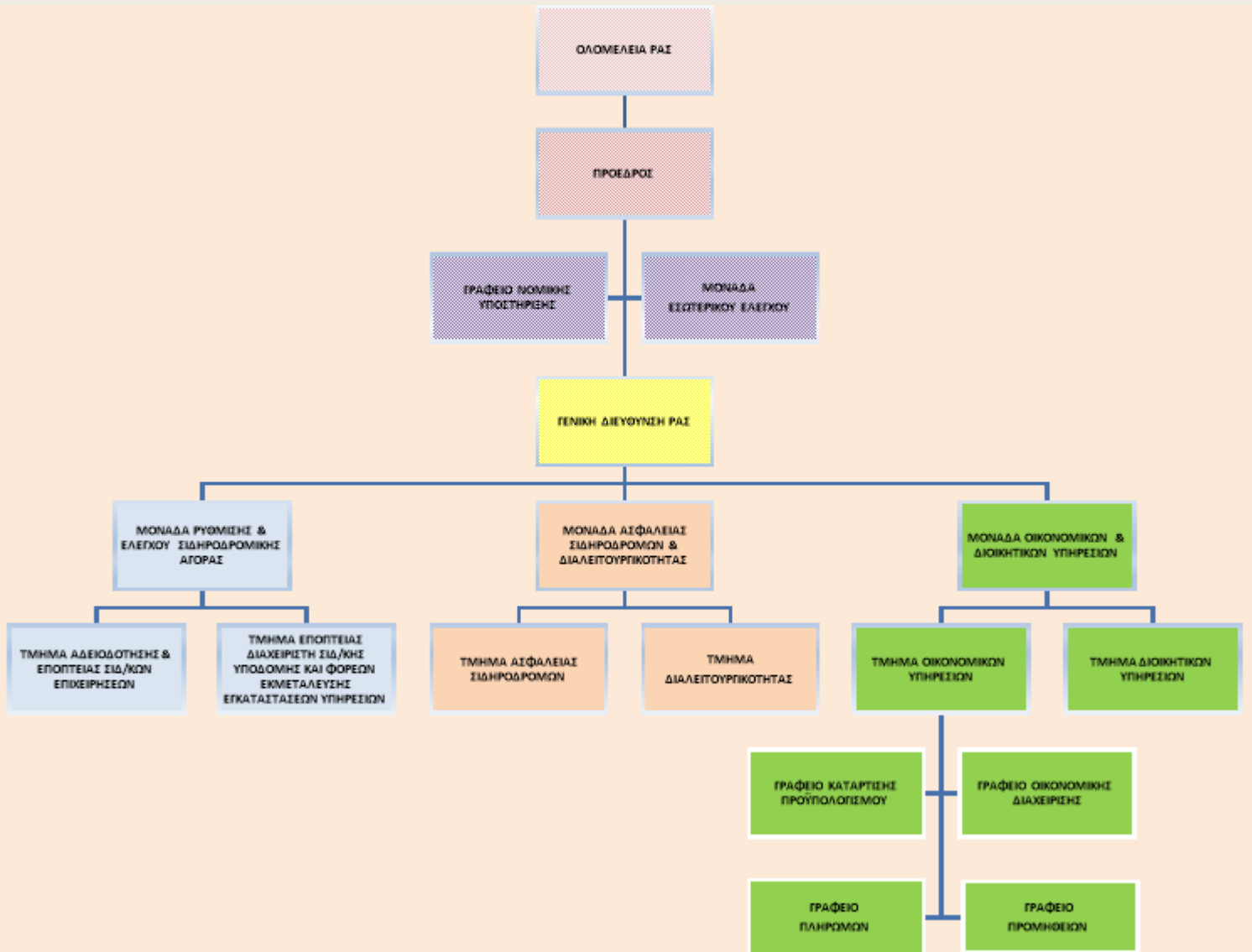


Table 1: Personnel of the Rail Safety & Interoperability Unit of RAS in 2022

Rail Safety and Interoperability Unit	Provided number of staff positions	Number of covered staff positions	Number of vacant staff positions
Railway Safety Department	6	6*	0
Interoperability Department	5	2	3
Total	11	8	3

*4 out of 6 officers are exclusively employed at the Railway Safety Department

4. SAFETY PERFORMANCE

4.1 Analysis of particular safety performance information in the last five years

4.2 CSI data charts



4 SAFETY PERFORMANCE

4.1 Analysis of particular safety performance information in the last five years

Based on the CSIs reported from 2018 to 2022, the following safety performance trend analysis was conducted:

Number of significant accidents:

(Definition of a significant accident: at least 1 fatality or 1 serious injury, or damages over €150,000 or a delay of more than 6 hours):

2018	2019	2020	2021	2022	2018-22 average
24	18	9	14	19	16.8

The total number of significant accidents for 2022 compared to the respective number of previous years, with the exception of 2018, has increased.

A great percentage of accidents (11 accidents, 58%,) are accidents caused to persons by rolling stock in motion. These are cases of pedestrians struck by trains along the railway track (level crossings not included). This category remains the main cause of serious accidents. Additionally this marker also increased significantly, in the order of 100%, compared to the last two years. The most important reason for accidents is the habit of local residents (in areas the train passes through) to cross the track on foot or to walk along it at points where it is not allowed instead of using overhead pedestrian crossings or level crossings (LC), as well as the lack of road behaviour culture. Another important reason are the flow of refugee people moving within the outline of the lines as well as the recovery of the productive work in 2022 to pre-COVID-19 levels.

The next category of significant accidents and the one with the most accidents in 2022 (5 accidents, 24%) regards Level Crossings. Such accidents involve a collision of vehicles with a train and are mainly caused due to, light and sound, sign and warning violations at the crossings by passing drivers. In 2022 there was 1 incident at unprotected crossings (2 incidents in 2021), 2 incidents at crossings with a manual protection system (2 incidents in

2021) and 2 incidents in crossings with an automatic protection system (3 incidents in 2021). Due to the low number of incidents safe conclusions cannot be made.

Number of fatalities:

2018	2019	2020	2021	2022	2018-22 average
17	12	2	6	10	9.4

For a second consecutive year, in 2022 the number of deaths increased compared to 2020, while it is also higher than the average of the last five months. The ten (10) deaths in 2022 are due to accidents at level crossings (2 incidents) and pedestrians hit by rolling stock in movement - suicides excluded - (8 incidents).

Number of serious injuries:

2018	2019	2020	2021	2022	2018-22 average
12	8	7	6	9	8.4

The number of serious injuries in 2022 (9 incidents) is slightly increased compared to the last three years. It has also marginally increased compared to the average of the last five years *8.4).

The highest percentage (56%) of accidents was caused to persons by rolling stock in motion. These are cases of pedestrians hit by trains along the tracks (level crossings not included), which is the main cause of serious accidents.

The second category with the most serious accidents regards level crossings and there have been 3 incidents (33%). Such accidents involve a collision of vehicles with a train and are mainly due to sign and warning breaches at the crossings by drivers passing through.

Number of suicides:

2018	2019	2020	2021	2022	2018-22 average
5	2	4	1	0	2.4

In 2022 there were no suicides. In the last five years there has been a steady reduction of the number of suicides with the exception of 2020.

Number of precursors to accidents:

2018	2019	2020	2021	2022	2018-22 average
101	74	56	86	71	77.6

The number of precursors to accidents in 2022, compared to the respective number in 2021, is reduced, which is due to the fact that in 2022 extensive parts of the line were placed in a different category, namely from “active network” to “active network on temporary suspension” resulting in the reduction of the active network, together with the more moderate weather in the summer of 2022, while it is slightly reduced compared to the average of the last five years.

Cost of serious accidents (in million Euro):

2018	2019	2020	2021	2022	2018-22 average
18.71	13.14	7.01	17.41	29.52	17.16

The financial cost of significant accidents in 2022 compared to 2021 increased by 70%, which confirms the increase of productive work in 2022 compared to 2021 (a year with reduced productive work due to COVID-19 pandemic). Compared to the average of the last five years it is increased.

This increase is due to the increased number of deaths and serious injuries due to the increased refugee people flows moving within the outline of the lines.

The cost due to fatalities amounts to €25.94 million (which remains the greatest part of the total cost) and is significantly increased compared to 2021 (€14.56 million) in conjunction with the increase of fatalities (10 in 2022 and 6 in 2021). The cost due to injuries amounts to €3.57 million and is slightly reduced compared to 2021 (€2.22 million).

The cost of material damages in trains and superstructure due to significant accidents is €0.13 million and has returned to the 2020 levels. In 2021 this marker was particularly increased due to an accident that took place in that year.

Delays of passenger trains due to significant accidents amount to 2384' and are increased by 60%, while the delays of freight trains amount to 196' and are decreased by 18% compared to the previous year.

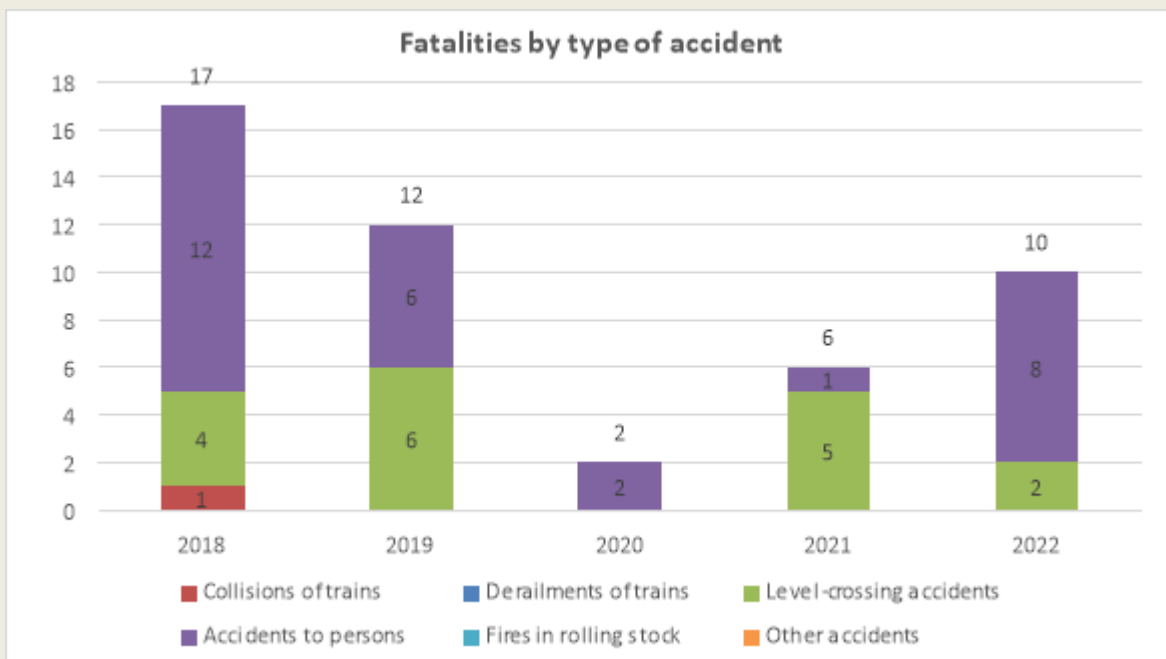
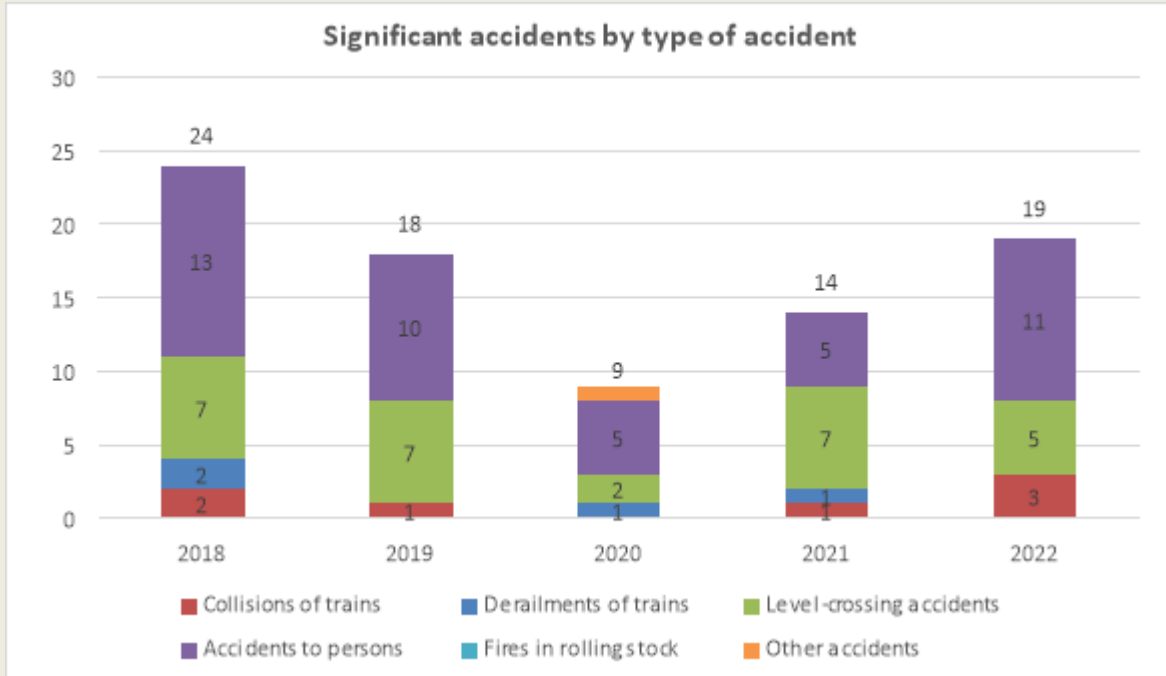
Technical safety of infrastructure and its implementation, safety management:

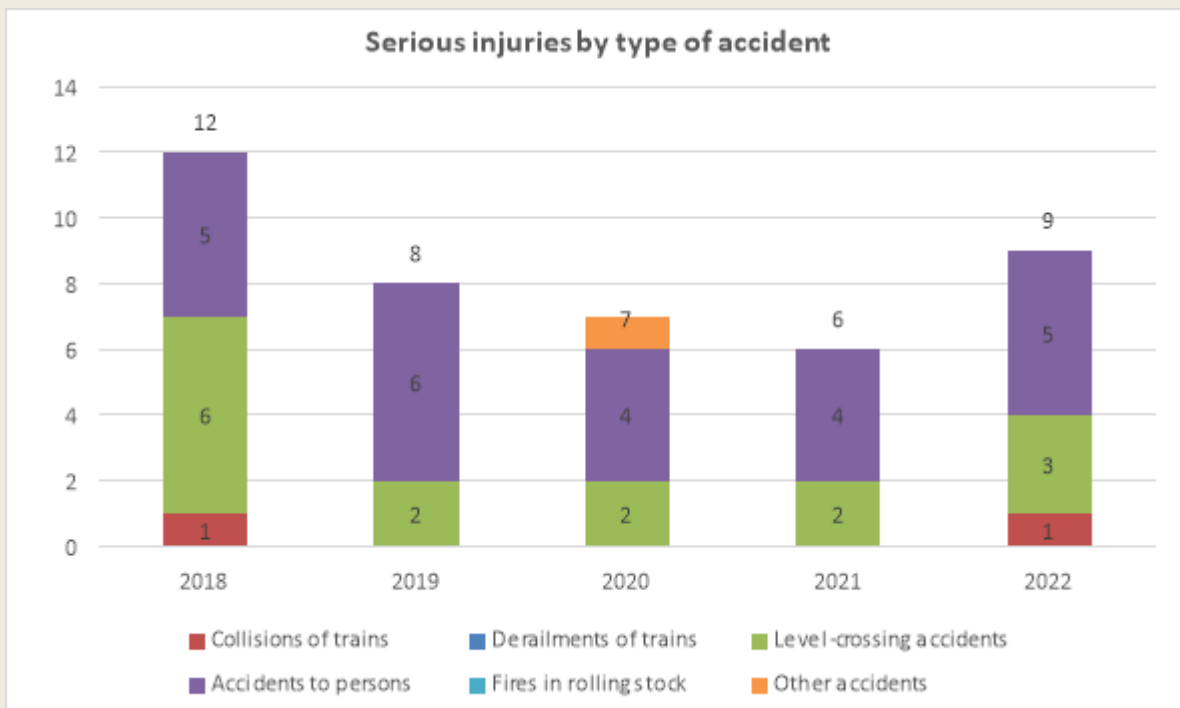
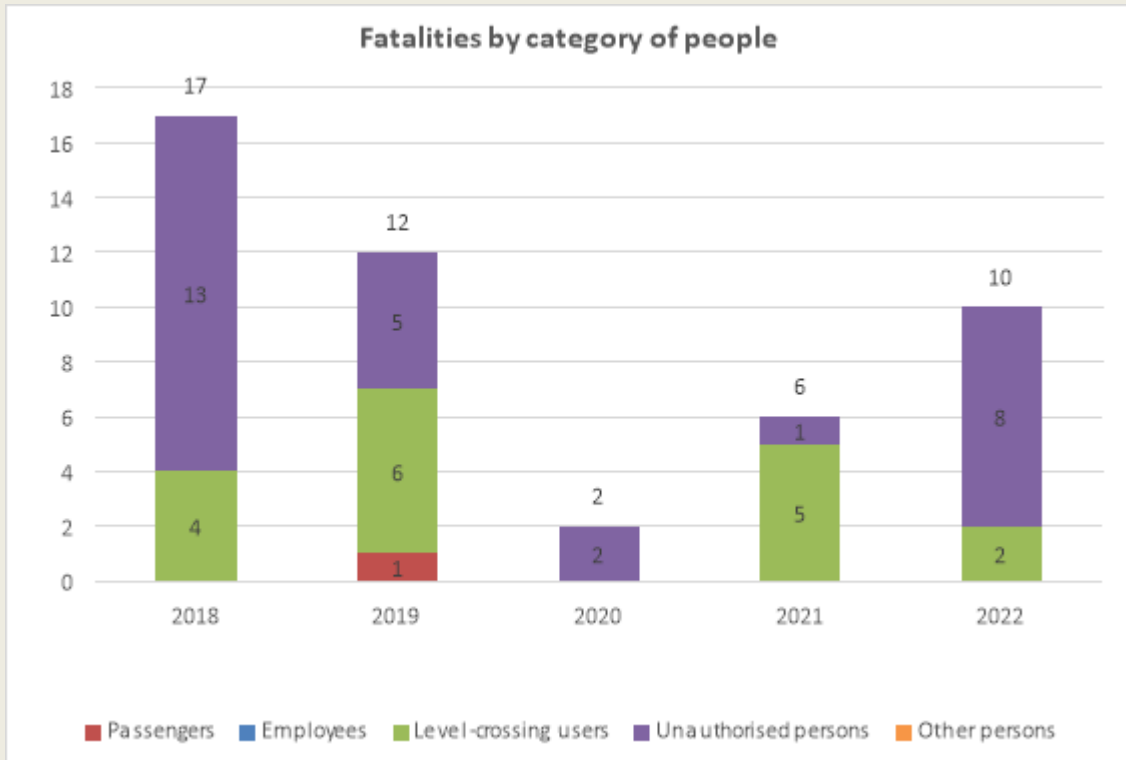
Number of level crossings by type:

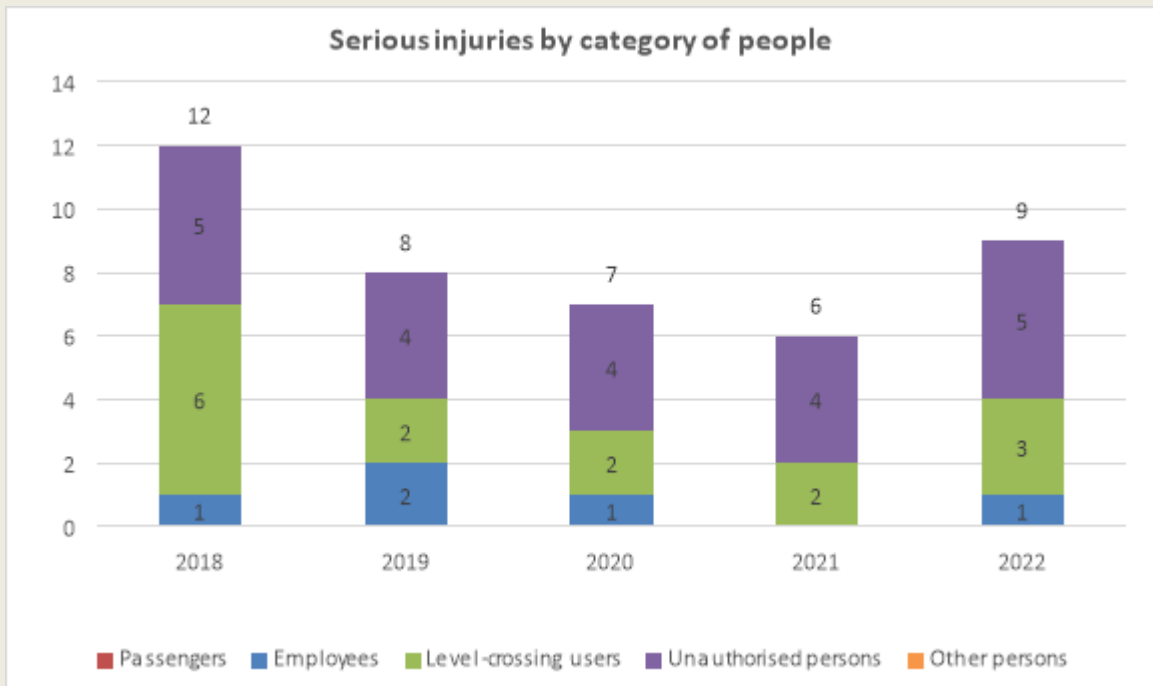
	2018	2019	2020	2021	2022
Active	695	685	684	685	449
Passive	568	551	552	549	292
Total	1263	1236	1236	1234	741

The number of LCs of the national network for 2022 was significantly reduced compared to 2021. According to the Network Definition by OSE IM, in 2022 extensive parts of the line were placed in a different category, namely from “active network” to “active network on temporary suspension” and this is the reason of the above significant reduction of level crossing (both active and passive LCs) in 2022.

4.2 CSI data charts







5. EU LEGISLATION AND REGULATION

5.1 Changes in laws and regulations

5.2 Derogations pursuant to Art. 15 Directive (EU) 2016/798



5. EU LEGISLATION & REGULATION

5.1 Changes in laws and regulations

All legislative acts of 2022 were issued following a collaboration with and notification of the railway sector, with the care of the Greek Ministry of Infrastructure & Transport and RAS.

In 2022, the following legal and regulatory acts on railway safety and interoperability were issued on a European level:

1. COMMISSION DELEGATED DIRECTIVE (EU) 2022/2407 amending the Annexes to Directive 2008/68/EC of the European Parliament and of the Council to take into account scientific and technical progress (RID).

In 2022, the following legal and regulatory acts regarding inter alia railway safety and interoperability were issued on a national level:

1. JMD “Definition of fees and national hourly rate, in application of Articles 83 and 84 of L. 4632/2019”. (B’ 2130/2022).
2. L.4955/2022 (A’139) Article 66 Regulation of issues pertaining to the Train Drivers of the Railway Organisation of Greece (OSE S.A.).
3. L.4942/2022 (A’115) Ratification of the Agreement between the Government of the Hellenic Republic and the Government of the Republic of Bulgaria for the regulation of the cross-border rail traffic.

Additionally, the following Decisions of RAS's Plenary were issued by RAS and published in the Government Gazette:

1. No 939/01-04-2022 “Definition of qualifications, terms and conditions for granting an initial recognition and renewal of the examiners of Train Driver and Candidate Train Driver Training Centres” (B’ 1904/2022).
2. No 18/18-03-2022 “Appointment of an Examination Entity of Consultants for the Safe Transfer of Dangerous Goods (SAMEE) for Rail Transfers” (B’ 1510/2022).

5.2 Derogations pursuant to Art. 15 Directive (EU) 2016/798

In Greece, no derogation pursuant to Art. 15 Directive (EU) 2016/798 has taken place in 2022.

6. SAFETY CERTIFICATIONS, SAFETY AUTHORISATIONS AND OTHER CERTIFICATES ISSUED BY THE NSA

- 6.1 Single Safety Certificates and Safety Authorisations
- 6.2 Vehicle Authorizations
- 6.3 Entities in Charge of Maintenance of Freight Wagons (ECM)
- 6.4 Train Drivers
- 6.5 Other types of Authorizations and Certifications
- 6.6 Contacts with other National Safety Authorities
- 6.7 Exchange of Information between NSAs and Railway Operators
- 6.8 Cooperation with the EU Railway Agency



6. SAFETY CERTIFICATIONS, SAFETY AUTHORISATIONS AND OTHER CERTIFICATES ISSUED BY THE NSA

6.1 Single Safety Certificates and Safety Authorisations

In 2022, two (2) Single Safety Certificates were issued by the European Railway Agency (ERA), for which RAS assessed the national part of the relevant applications, pertaining to the national rules, while RAS also provided experts to support ERA with the assessment of the European part of the applications, pertaining to the safety management system. In particular, one (1) new single safety certificate was issued for HELLENIC TRAIN RU (former TRAINOSE), one (1) renewal of a single safety certificate for the RAIL CARGO LOGISTICS GOLDAIR (RCLG) RU, in application of article 62 (5) of L.4632/2019.

Furthermore, in 2022, RAS as the competent safety certification body issued one (1) new single safety certificate for the RAIL CARGO LOGISTICS GOLDAIR (RCLG) RU, in application of Article 62(8) of L.4632/2019, with a limited duration of six (6) months.

As regards safety authorisations, RAS issued one (1) update of a safety authorisation for OSE IM in application of Article 64 of L.4632/2019.

The following table presents the Safety Certificates and Authorisations in force issued either by RAS or ERA until the end of 2022.

Company	History	Date of issue	Valid until	Certificate Type	Type of service
OSE	Up-date	21-06-22	03-10-26	Safety Authorization	Infrastructure Manager This Safety Authorisation includes Activities for the maintenance of vehicles used by OSE IM, exclusively for its own operations (not including freight wagons) and proves

Company	History	Date of issue	Valid until	Certificate Type	Type of service
					its compliance with Annex II of Implementing Regulation (EU) 2019/779, in application of article 3(4) of the same Regulation.
RAIL CARGO LOGISTICS GOLDAIR (RCLG) SA	Renewed	20-12-22	19-12-27	Single Safety Certificate	Freight, dangerous goods carriage services included
STASY S.A.	New	07-11-21	06-11-26	Single Safety Certificate	Passenger, high-speed services included
GFR	Up-date	21-07-21	08-04-25	Single Safety Certificate	Freight, dangerous goods carriage services included
HELLENIC TRAIN	New	21-12-22	20-12-27	Single Safety Certificate	<p><u>Greece</u> Passenger, high-speed services not included - Freight, carriage of dangerous goods included</p> <p><u>Bulgaria</u> Freight, carriage of dangerous goods included</p>

There were no changes in the procedures of RAS with regard to the issuance of Safety Certificates/Authorisations, excluding those introduced with the new legislation, which transposed the 4th Railway Package (L.4632/2019).

Detailed information, per railway operator, related to the status of the relevant safety certificates and authorisations, follows below.

OSE

Safety Authorization No EU EL 21 2021 0001 was granted to OSE S.A. Infrastructure Manager (IM) by decision of RAS's Plenary in October 2021 and shall be valid for five years, from 04.10.2021 through 03.10.2026.

In May 2022, OSE submitted to RAS an application for the update of the above safety authorization, submitting a file with the required documents. This application included activities for the maintenance of vehicles used by OSE IM, exclusively for its own operations (not including freight wagons) and proved its compliance with Annex II of Implementing Regulation (EU) 2019/779, in application of Article 3(4) of the same Regulation. The examination and assessment of the application for granting an update of the safety authorization and of the accompanying documents was carried out and completed by RAS on the legal basis of Article 12 of Directive (EU) 2016/798 and Article 64 of L.4632/2019 (A' 159). According to the aforementioned assessment and the provisions of Appendix II (4.5) to the Recommendation (EU) 2019/780 and the provisions of Annex II of Implementing Regulation (EU) 2019/779, the renewal of the safety authorization was granted with a note for taking the necessary measures for the rectification of shortcomings, the nature of which does not impede the granting of a renewal of an IM safety authorization. The completion of necessary actions shall be audited by RAS during supervision, after the issuance of the update of the IM safety authorization.

HELLENIC TRAIN

Since 2017, HELLENIC TRAIN (former TRAINOSE S.A.) has been a holder of the renewed Safety Certificates Part A (EL 11 2017 001) and Part B (EL 12 2017 0003), valid for five years, until 31-12-2022.

In August 2022, the RU with its application No. S-20220819-001 to ERA, via the OSS electronic platform, requested to be granted a new Single Safety Certificate. The above application was made with ERA due to the fact that the RU's operation area extends to the

cross-border stations of Kulata and Svilengrad within the Bulgarian territory and there is no translational - cross-border agreement in force between Greece and Bulgaria so that the relevant application be made with RAS. The updated certificate No. EU1020220295, was issued by ERA on 21-07-2021, with the participation of the Greek, and Bulgarian NSAs each of which assessed the national part of the application and the submitted file. The updated certificate shall be valid from 1-12-2022 through 20-12-2027 and it has been posted on ERA's ERADIS register. The above certificate mentioned "TRAINOSE" as the undertaking's name and, in the beginning of 2023, ERA issued a new certificate under No. EU1020230029 with "HELLENIC TRAIN" as the undertaking's name.

The new Single Safety Certificate was granted together with a note related to Application Issues, for which it was jointly agreed to be inspected by RAS during the supervision stage (remaining issues to be supervised).

STASY S.A.

Railway Undertaking STASY S.A. holds Single Safety Certificate No EL1020210173 since 2021. The single safety certificate is posted on the ERA's ERADIS register.

RAIL CARGO LOGISTICS GOLDAIR S.A. (RCLG)

Since 2016, Rail Cargo Logistics Goldair (RCLG) S.A. railway undertaking holds Safety Certificate (Part A) No. EL 11 2016 0002, valid for five years through 29-09-2021 and, since 2017, Safety Certificate (Part B) No. EL 12 2017 001, valid for five years through 20-06-2022.

With Decision (48/2022) with Reg. No 1646/21-06-2022 of the 169th Plenary Meeting of RAS, on 21-06-2022 a Single Safety Certificate with limited duration of six months, valid from 21-06-2022 to 20-12-2022, was authorised and issued, following the submission of the relevant application No. S-20220302-001 of the RCLG RU in March 2022. The certificate with the European ID No. EL1020220148 was posted on the ERADIS platform of ERA. The above a Single Safety Certificate with limited duration was granted to RAIL CARGO RU in order to ensure that the RU operates legal in the national infrastructure, since the RU had failed to submit an application for the issuance of a Single Safety Certificate in due time, despite RAS's continuous and timely requests.

In August 2022, the RU with its application No. S-20220818-001 to ERA, via the OSS electronic platform, requested a renewal of the above Single Safety Certificate. The above application was made with ERA due to the fact that the RU's operation area extends to the cross-border stations of Kulata and Svilengrad within the Bulgarian territory and there is no translational - cross-border agreement in force between Greece and Bulgaria so that the relevant application be made with RAS. The updated certificate No. EU1020220294, was issued by ERA on 20-12-2022, with the participation of the Greek, and Bulgarian NSAs each of which assessed the national part of the application and the submitted file. The renewed certificate shall be valid from 20-12-2022 through 19-12-2027 and has been posted on ERA's ERADIS register.

The new Single Safety Certificate was granted together with a note related to Application Issues, for which it was jointly agreed to be inspected by RAS during the supervision stage (remaining issues to be supervised).

PIRAEUS EUROPE ASIA RAIL LOGISTICS (PEARL) SA

Since 2016, PEARL SA RU holds Safety Certificate (Part A) No. EL 11 2016 0003, valid for five years through 18/12/2021 and since 2017 Safety Certificate (Part B) No EL 12 2017 002 valid for five years through 09-11-2022. Following a respective application by the RU for the amendment of the Safety Certificates - Part A and Part B, RAS issued on 21/03/2018 Safety Certificate (Part A) No. EL 11 2018 001 and Safety Certificate (Part B) No. EL 12 2018 001, Part A being valid through 18/12/2021 and Part B through 09/11/2022. The Safety Certificates (Part A & B) have been posted on ERA's ERADIS register.

In 2021 RAS informed the RU about the impending expiry of the safety certificates (Part A and B) within the year, as well as about the application and accompanying file submission process via the OSS service for the issuance of a single safety certificate.

In November 2022, the RU with its application No. S-20221102-004 to RAS, made via the OSS electronic platform, requested to be granted with a new Single Safety Certificate.

There was a series of deficiencies of which the most serious was the lack of ownership of locomotives by the RU which were noted as main Non- Compliances by RAS during the inspection for the application's completeness.

Following this the RU chose to cancel its application on the OSS platform.

GFR

Since 2021, GFR RU has held an updated Single Safety Certificate issued by ERA, on 21-07-2021, with ID No. EU1020210087 and period of validity from 21-07-2021 to 08-04-2025, posted on ERA's ERADIS record.

In the context of the application's file assessment for the granting of the above Single Certificate category 3 Application Issues were identified, and it was jointly agreed that they be inspected at the supervision step (remaining application issues to be supervised).

In 2022, the RU started to offer services on the national network and RAS started the inspection of the above identified Application Issues both in the context of supervision and via correspondence with the RU.

6.2 Vehicle Authorizations

As regards 2022, RAS issued the following authorisations of vehicles to be launched in the market:

- 1 For the case of a “new authorisation” with the Greek network as the area of use, RAS completed the assessment via the OSS platform based on the relevant legislation, and authorised one (1) self-propelled passenger train of TRENITALIA S.p.A. The application was submitted on 28-04-2021 and the authorisation was issued on 22-02-2022.
- 2 For the case of an “authorisation of compliance with a type” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised three (3) self-propelled passenger trains of TRENITALIA S.p.A. The application was submitted on 04-03-2022 and the authorisation was issued on 24-03-2022.
- 3 For the case of an “authorisation of compliance with a type” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised one (1) self-propelled passenger train of TRENITALIA S.p.A. The application was submitted on 16-06-2022 and the authorisation was issued on 08-07-2022.
- 4 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) self-propelled passenger train of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
- 5 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and

- authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) self-propelled passenger train of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
- 6 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) self-propelled passenger train of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
 - 7 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) propelling unit of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
 - 8 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) propelling unit of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
 - 9 For the case of a “new authorisation” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised, due to the installation of ETCS on-board system on an existing vehicle, one (1) self-propelled passenger train of GAIAOSE S.A. The application was submitted on 02-09-2022 and the authorisation was issued on 18-11-2022.
 - 10 For the case of an “authorisation of compliance with a type” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised nine (9) self-propelled passenger trains of GAIAOSE S.A. The application was submitted on 08-12-2022 and the authorisation was issued on 21-12-2022.
 - 11 For the case of an “authorisation of compliance with a type” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised eleven (11) self-propelled passenger trains of GAIAOSE S.A. The application was submitted on 09-12-2022 and the authorisation was issued on 21-12-2022.
 - 12 For the case of an “authorisation of compliance with a type” with the Greek network as the area of use, RAS made the assessment via the OSS platform based on the relevant legislation, and authorised ten (10) self-propelled passenger trains of

GAIAOSE S.A. The application was submitted on 09-12-2022 and the authorisation was issued on 21-12-2022.

6.3 Entities in Charge of Maintenance (ECM) of Rail Vehicles

RAS is the body appointed by the Greek legislation with the duties of the competent ECM Certification Body with certificate No EL/30/0021/001, in accordance with Article 66 of Law 4632/2019, as described in Regulation (EU) 2019/779. Said Regulation replaced Regulation (EU) 445/2011 on 16/06/2020.

In accordance with the above Regulation in force, RAS as a Certification Body grants ECM certificates following the assessment of the applicant's capacity in terms of fulfilling the relevant requirements of Appendix II to the Regulation (EU) 2019/779. Said certificate is valid for a five (5) year period. In order to ensure continuous conformity of the ECM as regards applicable requirements, the Regulation includes a post-certificate surveillance system.

In accordance with the new Regulation, ECM certification is obligatory for every entity in charge of maintenance:

- 1) responsible for the maintenance of freight wagons or
- 2) which is not a railway undertaking or infrastructure manager maintaining vehicles exclusively for its own operations.

Every entity in charge of maintenance of vehicles, except for those mention in clauses (a) and (b), may submit an ECM certification application.

The certification system offers responsibility and traceability evidence for the maintenance carried out to the vehicles. It also defines a certification procedure ensuring a transparent and structured management system for maintenance operations and contributes to the reduction of the load and repetition of audits and/or audits in the railway sector overall. ERA publishes the list of accredited and recognised certification bodies, as well as the ECM certificates in the ERADIS data base.

Detailed information, per ECM, related to the status of the relevant ECM compliance certificates, follows below.

HELLENIC TRAIN (former TRAINOSE)

In May 2020, TRAINOSE due to the merge of the companies TRAINOSE - subsidiary of Ferrovie Dello Stato Italiane S.p.A. - and EESSTY, with the acquisition of EESSTY by TRAINOSE, submitted an application for the update/amendment of the existing ECM

Certificate of the EESSTY former company, in accordance with the provisions of Regulation (EU) 445/2011, so that it is updated pursuant to the new ownership structure and organizational chart. By decision of the Plenary of October 2021 the update/amendment of ECM certificate No EL3100180001 of EESSTY and the forwarding thereof to TRAINOSE.

The updated/amended certificate No EL 3100210001 granted by RAS shall be valid for two years from 18.10.2021 through 10.10.2023.

In February 2022, HELLENIC TRAIN (former TRAINOSE) with its application with Reg. No RAS 498/ 17-02-2022 to RAS, requested to be granted an ECM Certificate with the activity scope of “Freight wagons, locomotives, multiple units, passenger vehicles”. The review and assessment of the application for the issuance of a Certificate, as well as of the accompanying documents, took place and was completed in 2022 by RAS under Article 66 Law 4632/2019 and the requirements of Annex II of Implementing Regulation (EU) 2019/779. An assessment plan was drafted and completed (inspection schedule) with a duration of 5 days, which took place on 23 & 24-05-2022 at the Engine Room of Agios Ioannis Renti, on 25-05-2022 at the Volos Plant, on 26 & 27-05-2022 at the Thessaloniki Engine Room. During the inspection, inter alia, interviews were held with the Head of the plants (Supervisor), the head of the Labour Organisation Office, together with the remaining personnel at the plants.

By decision (91/2022) of the 186th Plenary Meeting on 18-11-2022 a Certificate for an Entity in Charge of Maintenance (ECM) was issued for and granted to HELLENIC TRAIN RU (former TRAINOSE).

The ECM Certificate No EL/31/0022/0001 granted by RAS is valid for five years from 18-11-2022 to 17-11-2027 and is posted on the ERADIS register of ERA.

With the Decision with Reg. No 816/16-03-2022 of the Plenary of RAS, the Certificate for an Entity in Charge of Maintenance (ECM) No EL 31 0018 0001 / 18-10-2021 of TRAINOSE RU (currently HELLENIC TRAIN) was withdrawn because its scope is covered by the scope of the new ECM Certificate in force.

OSE

In May 2022 OSE IM submitted to RAS an application for, and later received, an update of the safety authorization regarding the activities for the maintenance of vehicles used by OSE IM, exclusively for its own operations (not including freight wagons) and proves its compliance with Annex II of Implementing Regulation (EU) 2019/779, in application of article 3 (4) of the same Regulation.

Later, in June 2022, OSE with its application under Reg. No RAS 1579/15-06-2022 to RAS, requested to be granted an ECM Certificate with "Freight Wagons" as the scope of

activities. An assessment plan was drafted and completed (inspection programme) with a duration of 2 days, which took place on 20 & 21-10-2022 at the Plant of Volos. During the inspection, inter alia, interviews were held with the Head of the plant (Supervisor), the head of the Labour Organisation Office, together with the remaining personnel at the plants. The review and assessment of the application for the issuance of a Certificate, as well as of the accompanying documents, took place and was completed in 2023 by RAS under Article 66 Law 4632/2019 and the requirements of Annex II of Implementing Regulation (EU) 2019/779.

STASY

STASY RU maintains its vehicles exclusively for its own operations. With a suggestion of ERA and RAS, STASY chose to prove its compliance with Annex II of the Implementing Regulation (EU) 2019/779 with the safety certification procedure. In the context of the above procedure, taking into account the fact that STASY RU already holds a single safety certificate with European ID No. EL1020210173 since 07-11-2021, valid through 06-11-2026 (a later date than 16-06-2022), in order to achieve its compliance with Implementing Regulation (EU) 2019/779, as an Entity in Charge of Maintenance (ECM) of vehicles for its own operations, the performance of intermediated inspections of STASY RU about the observation of Annex II of said Regulation, during the supervisory activities of RAS. The performance of said inspections does not require the update of the existing single safety certificate with European ID No. EL1020210173.

In the context of the intermediate inspections by RAS, on 07-12-2022 an inspection supervision of STASY ECM took place. During this inspection the implementation of the relevant Safety Management System was audited with regard to its compliance with the following operations

- III “Requirements and assessment criteria for the fleet maintenance management operation” and
- IV “Requirements and assessment criteria for the maintenance implementation operation”,

as requirements and assessment criteria included as units of Annex II to the Implementing Regulation (EU) 2019/779.

RAS, in order to facilitate interested parties, has drafted a summary procedure for the issuance of the ECM certificate, the setting up of a post-certificate surveillance system, as well as the amendment, renewal, suspension or withdrawal thereof. The procedure can be

[Regulatory Authority for Railways, 33 Stadiou str. | 105 57 Athens | \[info@ras-el.gr\]\(mailto:info@ras-el.gr\)](https://www.ras-el.gr)

found on RAS's website. Furthermore, RAS every year prepares an ECM Surveillance Framework-Plan for the next year.

6.4 Train Drivers

6.4.1 General

RAS is the competent authority for the supervision of the implementation of provisions of Law 3911/2011 (Gov. Gaz. 12/A/08-02-2011), transposing in the Greek Law European Directive 2007/59/EC and regulating train driver licensing and certification issues, for train drivers operating in the Greek railway network. In accordance with these provisions, every train driver should hold:

- A **license** proving that the train driver fulfils the minimum requirements with regard to medical requirements, the basic training and general professional credentials.
- One or more **certificates**, mentioning the infrastructures on which the certificate holder is allowed to drive, as well as the rolling stock they are allowed to drive.

Both the license and the certificate are granted following a relevant training in certified and recognised training centres and a successful examination by RAS as regards the license and by the Railway Undertaking (RU) or the Infrastructure Manager (IM) as regards the certificate.

6.4.2 Issuance of train driver licenses

In accordance with L.3911/2011, RAS is the competent authority for the issuance of train driver licenses under the community template of Appendix I to Regulation (EU) No. 36/2010. According to the provisions of the above law, the printing of the train driver licenses was assigned to the Hellenic National Passport and Secure Document Centre of the Headquarters of the Hellenic Police (DDEA).

RAS, for the implementation of the above relevant legislation, has installed and operates an electronic internet programme-application named "TRAIN DRIVER LICENSES", via which it receives applications for the issuance and granting of train driver licenses.

The first licenses were issued in February 2019, in accordance with the template in Annex I to Regulation (EU) 36/2010 and in 2022, 72 European licenses were issued in total. All the licenses issued in 2022 regarded HELLENIC TRAIN RU.

6.4.3 Keeping of the National Register of Train Driver Licences

In accordance with Article 22 Law 3911/2011, competent authorities must keep a National Register of Train Driver Licences, in which details and information are registered regarding the train driver licences issued, also pursuant to Decision 2010/17/EC.

With the details of each license at the Register the “date of the next medical examination” is registered inter alia, in accordance with the Health Certificate in Annex II of Article 9 JMD No ΑΣ19/38259/1879/23-09-2016 (B’ 3242) and the required frequency provided in Chapter 3 of Annex I to Article 31 of Law 3911/2011. In 2021 RAS proceeded to the withdrawal of licenses either because the deadline for the periodical examinations had expired, or because the train driver was deemed by the competent doctors as “Not Capable” at the Health Certificate, in the context of periodic medical examinations following the train driver license issuance.

The “TRAIN DRIVER LICENSES” programme/application is connected and feeds the National Train Driver Licenses Register kept by RAS with the data of the train drivers, in accordance with Decision 2010/17/EU “on the adoption of main parameters for registers of train driver licences”.

In 2022 the National Train Driver Licenses Register contained the information for 391 train driver licenses, of which 91 licenses have been suspended.

6.4.4 Train driver certificates

RAS requested that the RUs begin issuing train driver certificates for train drivers for whom a train driver license has been issued and that they keep a Complementary Certificate Register. HELLENIC TRAIN, STASY, and RCLG RUs have issued the train driver certificates in accordance with the template of Annex II to Regulation (EU) 36/2010 and have distributed copies thereof to the train drivers.

HELLENIC TRAIN RU gave RAS access via cloud to the electronic folder with the train driver certificates and the Register thereof, in accordance with the provisions in the legislation, for the performance of RAS’s supervision activities. Similarly PEARL RU sent the train driver certificates in an electronic format and granted RAS access to the electronic file with the train driver certificates and the Register thereof. In case of any amendment, STASY RU shall send an updated spreadsheet with the train driver certificates. RCLG RU has granted RAS access to the electronic file with the train driver certificates. Finally, GFR RU has sent the train driver certificates in electronic format.

The certificates are reviewed by officers of the Railway Safety Department in accordance with the certificates by the OSE training centre on the completion of the authorized training programme and the certificates by the RU for the successful completion of exams.

6.4.5 Recognition and Operation of OSE Training Centre for train driver and candidate train driver training

The Regulatory Authority for Railways (RAS) is the competent authority for the recognition of train driver and candidate train driver training centre, in accordance with Article 2 of JMD ΑΣ19/οικ.53229/395 / 09-07-2018 (Gov. Gaz. Β 2838/16.07.2018).

In accordance with the above, RAS recognised OSE's Training Centre as a train driver and candidate train driver training centre with its decision under Reg. No 8495/23.08.2018. OSE's training centre has been recognised for the following training duties:

- i. General professional knowledge, required for the acquisition of a train driver license, in accordance with Appendix II to Law 3911/2011.
- ii. Professional knowledge required for the acquisition of a train driver certificate for rolling stock, in accordance with Appendix IV to Law 3911/2011.
- iii. Professional knowledge required for the acquisition of train driver certificate for infrastructure, in accordance with Appendix V to Law 3911/2011.
- iv. Language knowledge required for the acquisition of train driver certificate, in accordance with paragraph 8 of Appendix V to Law 3911/2011.

The declaration of recognition of the OSE training center for train drivers and candidate train drivers was issued by RAS in 2018 and is valid through 22-08-2023.

In 2022 RAS did not issue a new statement of recognition of a train driver and candidate train driver training centre.

With regard to the training of candidate train drivers, OSE's recognised training center submitted in 2022, under article 23, L. 3911/2011, two (2) updated Training Programmes related to the train driver certificate. The Railway Safety Department reviewed the submitted programmes and prepared recommendations to the Plenary of RAS for their approval.

6.4.6 Regulation of Medical Issues of Train Drivers and Candidate Train Drivers / Medical Doctor Recognition

Applying the requirements of JMD No Σ19/38259/1879/2016 (Gov. Gaz. 3242/B/10.10.2016) RAS proceeded in the beginning of 2017 to the publication of an open call for expression of interest, of continuing validity, for the submission of

applications/participation of doctors in the procedure of recognition of medical doctors conducting medical examinations provided in Law 3911/2011.

The call for expression of interest in accordance with the JMD is of continuing validity and for this reason RAS continues collecting the applications of interested parties, in order to regularly update the Recognised Medical Doctor Register.

In 2022, RAS granted recognition to three (3) doctors to conduct the required examination for the confirmation of the physical and occupational psychological fitness of train drivers and candidate train drivers. All three (3) regarded a new recognition.

It is noted that in the Recognised Medical doctor Recognition all doctors of NHS public entities can be included, as provided in article 3 of the aforementioned JMD.

6.4.7 Train Driver and Candidate Train Driver Trainer Competence Certification

Article 76 of Law 4530/2018 (A'59) provides the competence certification for trainers at train driver and competent train driver training centers by RAS. Applying said Article, RAS's Decisions No 7690/11-05-2018 (Gov. Gaz. B' 1691) and 8664/01-10-2018 (Gov. Gaz. B 4687/18-10-2018) were issued in 2018 and published in the Gov. Gaz. and regarded the credentials, terms, and conditions for the issuance of train driver trainer certification.

Implementing the requirements of the above Decisions RAS published a relevant open call for expression of interest, of continuous validity, for the submission of applications of participation in the train driver-candidate train driver trainer training competence certification and the registration thereof in the Certified Trainer Register, kept by RAS and published on RAS's website under Law 3911/2011. It is noted that competence certificate is valid for three years and may be renewed in accordance with the provisions of the aforementioned Decisions by RAS.

In 2022 RAS granted Competence Certifications to thirty four (34) train driver-candidate train driver instructors and Competence certification renewals to thirteen (13) instructors. For the renewal of validity of certification of train driver trainers registered in the Train Driver Trainer Register, the interested parties must document a teaching experience of 150 hours or attendance at a trainer training programme, of at least 50 hours.

Finally, RAS proceeded to the elimination from the register of two (2) instructors following their relevant request.

By the end of 2022, the trainer register included 132 trainers.

6.4.8 Recognition of Examiners of Train Drivers and Train Driver Candidates

Article 76 of Law 4530/2018 (Gov. Gaz. 59/A/30-3-2018) provided the recognition by RAS of examiners for the control of candidate train driver required credentials, in order to acquire a train driver license. Applying said article, decision under No 9442/14.01.2019 (Gov. Gaz. 359/B/11-02-2019) “Definition of qualifications, terms and conditions for the granting of initial recognition and renewal thereof for the examiners at the Train Driver and Candidate Train Driver Training Center” was issued and published by RAS in 2019.

In 2022 RAS proceeded to amend the above decision and therefore a new decision with Reg. No RAS 939/01-04-2022 (Gov. Gaz. 1904/B/18-04-2022) and the same title was issued and published. The main reason for the amendment of this decision was the assignment of the review of the Train Driver Examiner recognition/renewal of recognition granting candidate applications to the Rail Safety Department and the subsequent elimination of the committee that reviewed the above applications until then. Additionally thanks to the experience gained upon the assessment of train driver and candidate train driver examiner recognition and renewal of recognition application (according to Decision No 9442/14-01-2019), further points of the decision needing to be improved were identified. With the new decision, now, there is the possibility to send the application and the necessary documents via e-mail and/or in the future via the “Licenses” electronic application, which is still at the design stage as regards the examiners. Finally, as regards the required qualifications of candidates point 3.1.b was corrected and “Graduates with at least ten (10) years of relevant experience” can now submit an application.

In 2022 RAS granted recognition to twenty eight (28) train driver-candidate train driver examiners and a renewal of recognition to thirteen (13) examiners. By the end of 2022, the examiner register included 42 examiners.

6.4.9 Training - Candidate Train Driver Examinations

The process for organizing and conducting the examination to obtain a train driver license is defined in accordance with RAS decision N. 10720/18--07--2019 (Gov. Gaz. B 2962/19--07--2019).

According to the above framework, by a decision of RAS's President a Central Examination Committee (CEC) was established to organise and determine the examination process. Its term was for three years and expired on 18-07-2022. By decision (60/2022) of the 174th Plenary Meeting on 25-07-2022 the term in office for committee members was renewed for three (3) additional years.

A CEC decision approved that the pool of questions for the examinations be enriched with further questions, submitted by OSE's recognized training centre and certified trainers. The

[Regulatory Authority for Railways, 33 Stadiou str. | 105 57 Athens | \[info@ras-el.gr\]\(mailto:info@ras-el.gr\)](http://www.ras-el.gr)

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enriched pool of questions was posted on RAS's webpage. For conducting the examination, CEC established Examination Committees made up of examiners listed in the Recognized Train Driver Examiner Register kept by RAS.

In application of the above decisions for 2022, theoretical and practical examinations took place on 05-09-2022 & 06-09-2022 and 12-09-2022 & 13-09-2022 at the OSE vocational training center and at the train Services in the Athens-Lianokladi and Thessaloniki-Katerini parts, with the participation of seventy three (73) candidate train drivers of the HELLENIC TRAIN RU .

Furthermore, repeat examinations for the theoretical part took place on 23-11-2022 at the OSE vocational training centre for two (2) candidates that had failed the initial examination.

By decisions of the RAS Plenary the results of the examinations of train driver candidates and granting of relevant successful examination attestations to successful candidates, so that they may apply for the issuance of a train driver license.

6.5 Other types of Authorizations / Certifications

In the context of the assessment of applications and technical files for the authorization of the placing into service of fixed installations

1. On 16-12-2021, OSE, as infrastructure manager, submitted with RAS an application and technical files for the authorization of the placing into service of the "Track-side control - operation and signalling (CCS)" subsystem. Object of the application was the GSM-R system radio communication subsystem at the parts of railway axis Piraeus-Thessaloniki-Promahonas, Kiato-Airport (the part Tithorea-Domokos is not included) and the line branches Thrasio-Ikonio and Inoi-Chalkida. The authorisation was issued on 05-07-2022.
2. On 20-04-2022, OSE, as the infrastructure manager submitted with RAS an application and technical files for the authorization of the placing into service of the "Track-side control - operation and signalling (ETCS, level 1)" subsystem. The object of the application was the ETCS track-side subsystem and it regards the following parts of the line: Plati- TX1 (B1) (37.3 km), TX1-TX5 (B2) (7 km), TX1 – Promahonas (B3) (143,4 χλμ) and Inoi – Chalkida (A2) (22 km). The authorisation was issued on 07-11-2022.
3. On 23-05-2022, OSE, as infrastructure manager submitted with RAS an application and technical files for the authorization of the placing into service of the "Track-side control - operation and signalling (ETCS, level 1)" subsystem. The object of the

application was the ETCS track-side subsystem and it regards the new Kiato - Rododafni railway line. The authorisation was issued on 07-10-2022.

6.6 Contacts with other National Safety Authorities

In 2022 RAS collaborated with ERA representatives as well as with the NSA, in the context of the assessment of the applications of HELLENIC TRAIN and RAIL CARGO RUs for the granting of a Single Safety Certificate.

Furthermore, contact was made via e-mail between RAS and the Bulgarian NSA in order to enquire the possibility of a cross-border agreement about the requirements for the issuance of Single Safety Certificates for RUs operating up to the cross-border stations of the two countries.

There were no outcomes of discussions with other NSAs on supervision results.

6.7 Exchange of Information between NSAs and Railway Operators

In 2022, RAS continued exchanging views and information with railway operators on issues related to railway safety and interoperability. This exchange of information is usually carried out through regular and extraordinary supervision, or other meetings as well as through correspondence. Railway Operators can express opinions on issuing procedures/practices, can file complaints to RAS and can raise any topic for discussion. In accordance with the regulatory framework for supervision, at least one supervision meeting with each railway operator separately and at least one joint meeting with all the actors are carried out on an annual basis.

The topics discussed at the as above meetings in 2022 are listed below:

- An overview of the supervision activities of RAS in 2022 and their results - Planned actions to the implementation of the 2023 Supervision.
- Update regarding ERA's Management Maturity Model, as a SMS proper implementation assessment tool by the Railway Operators (RO).
- Information by the RO for actions regarding the implementation of Safety Culture.
- Implementation of the Implementing Regulation (EU) 402/2013 about the common safety method (CSM) for risk assessment.
- Drafting of RAS decision about the certification of personnel with Crucial Safety Responsibilities.

- Review of the legislative framework for the issuance of a Single Safety Certificate (SSC).
- SSC issuance procedure, application assessment course.
- Conclusions, experiences from the SSC issuance procedure via OSS.
- Cross border infrastructure and traffic.
- Non-inclusion of third countries outside the EU at the SSC OSS applications.
- Issuance of train driver certificates for cross-border infrastructure.
- Train driver training for acquiring a European License (time frame) and Certificates.
- Amendment of Article 23 of Law 3911/2011 (A'12).
- Information of the assessment of National rules in the safety sector by ERA.
- Effort to immediately repair damages and ensure careful maintenance, especially in periods with bad weather (frost or snow) at the change at the connecting tunnel of the OSE network, in order to maintain the STASY service to the Airport.
- Information about the activation of the ECTS-L1 protection system at the part of line D. Plakentias - Airport.
- Definition of the procedure for the authorization of the placing into service of new STASY trains that will use the national rail infrastructure

6.8 Cooperation with the EU Railway Agency

In 2022, RAS and the Agency collaborated within the framework of the Cooperation Agreement they concluded on 11--06--2019 in Bucharest, pursuant to article 76, Regulation (EU) 796/2016.

Specifically, they collaborated for the assessment of:

- Of application S-20220818-001 by the Rail Cargo Logistics Goldair (RCLG) S.A. RU for being granted a renewal of its Single Safety Certificate with service provision area in Greece up to the Kulata and Svilengrad cross-border stations within the Bulgarian territory. Within this framework, RAS evaluated the national part of the application. The relevant EU1020220294 single safety certificate was issued by the Agency on 20-12-2022, and is valid through 19-12-2027.
- Of application S-20220819-001 by HELLENIC TRAIN RU for being granted a new Single Safety Certificate with the service provision area being Greece and up to the Kulata and Svilengrad cross-border stations within the Bulgarian territory. Within this framework, RAS evaluated the national part of the application. The relevant

EU1020220295 single safety certificate was issued by the Agency on 21-12-2022, and is valid through 20-12-2027.

It is noted that in the context of the assessment of the European part of the above applications, RAS supported ERA via its two (2) experts, in application of the relevant provisions of the above mentioned Cooperation Agreement concluded between RAS and the Agency.

7. SUPERVISION

- 7.1 Strategy, planning and decision making
- 7.2 Supervision results
- 7.3 Coordination and cooperation
- 7.4 Follow-up audit of the RAS performance and decision making
by the Agency



7. SUPERVISION

7.1 Strategy, planning and decision making

The supervision of railway operators is one of the most important activities of RAS, in the context of duties performed as the National Safety Authority (NSA) under Article 68 of Law 4632/2019 (A' 159).

Delegated Regulation (EU) 2018/761 provides that supervision should be focused on the activities the NSA deems as posing the most serious risks or in cases when risks are less controlled. To this end, the NSA should prepare and implement a risk-based supervision Strategy and Plan(s), describing the way it selects the goals of its activities and the way it defines its priorities with regard to supervision.

Furthermore, in the provisions of article 4 of the RAS regulatory framework for supervision, it is mentioned that RAS by a decision approves, issues and implements a a three-year Supervision Strategy which it posts on its webpage.

For the implementation of the above requirement the Railway Safety and Interoperability Unit (RSIU) drafted a Supervision Strategy for RAS for the period 2020-2022, in accordance with the requirements of Annex I to the Delegated Regulation (EU) 2018/761, approved by RAS's Plenary in October 2020. This Strategy has been posted on RAS's webpage and the interested railway operators have been informed.

The Authority's supervision activity programme is approved at the beginning of each year and includes supervision activities per month of the year, per railway operator and the necessary resources (number of supervisors) for the completion of every supervision activity. The yearly schedule does not include any extraordinary or random supervision activities of RAS.

The Supervision Plan of 2022 practically implemented the above Strategy. Since every Supervision Plan is defined by the Strategy, it is based on the risks characterised as in need of supervision in said Strategy.

For the preparation and implementation of the Supervision Plan 2022 the following was taken into consideration:

- RAS's Supervision Strategy for 2020-2022 and mainly article 7 Strategic priorities for supervision.
- RAS's available resources:

- The type, area, and size of the RUs

TRAI NOSE (currently HELLENIC TRAIN) being the largest RU operating in the Greek railway network (in terms of type and volume of transport service but also in terms of size) shall be subject to the largest part of RAS's supervision activities for 2022.

- The continuation of compliance with the overall assessment criteria in Regulations (EU) 1158/2010, 1169/2010, 445/2011, (EU) 2018/762 and 2019/779 , within the validity period of the relevant Certificates and Authorizations.
- Outstanding issues from non-resolved compliances from previous supervision activities.
- Necessary collaboration between the NSAs in cases of cross border operation (Article 7.2 of the Strategy).

Until now the performance of joint supervisory activity together with the Bulgarian NSA, in the zone between the Promahonas RS and the Kulata RS, has not been possible until now. In accordance with the provisions of the 4th Railway Package and in particular of Article 62(8) L. 4632/2019 *"The single Safety Certificate is also in force without extension of the service provision area for the railway undertakings performing services at stations in neighbouring Member States with similar network characteristics and similar operation rules, when those stations are close to the borders, following a consultation with the competent national safety authorities. This consultation may take place on a case by case basis or be provided for in a cross-border agreement between the Member States or the National Safety Agencies"*. In the context of implementation of the aforementioned provision, RSIU continued the exploratory discussion and correspondence with OSE and the Bulgarian NSA for the regulation of the cross-border operation under the new Single Safety Certificate of the RUs, as well as the regulation of the performance of joint supervisory activity between the two NSAs.

- The activity targets (areas) and risk based priorities (risk based criteria) (article 7.3 of the Strategy).

The Supervision Plan for 2022 was approved in February and included eighteen (18) supervision activities on the IM and the RUs. Thirteen (13) out of eighteen (18) scheduled supervision activities eventually took place.

It should be noted that within 2022 the design and installation of an information system following up RAS's supervision activities was further developed, focusing on following up

findings identified during said activities, as well as monitoring the implementation progress for the relevant corrective actions undertaken for their remedy.

No complaints on the decisions made by RAS during the supervision activities were filed by the parties concerned.

7.2 Supervision results

In 2022, RAS performed the following supervision activities per railway operator:

- **OSE IM (2 supervisory activities)**
 - One (1) activity supervision (Vocational Training Center) - March.
 - One (1) supervision meeting - October.
- **HELLENIC TRAIN RU (2 supervisory activities)**
 - One (1) Safety Management System inspection (Safety Culture, CSM 1078/2012, 402/2013) – April.
 - One (1) supervision meeting – October.
- **HELLENIC TRAIN RU - ECM (1 supervisory activity)**
 - One (1) Rolling Stock Maintenance System inspection (ECM) - December.
- **STASY RU (2 supervisory activities)**
 - One (1) Safety Management System inspection (Personnel Training - Competence, Internal Inspections, CSM 402/2013) – November
 - One (1) supervision meeting - May
- **STASY RU ECM (1 supervision activity)**
 - One (1) Rolling Stock Maintenance System inspection (ECM) - December.
- **PEARL RU (1 supervision activity)**
 - One (1) supervision meeting – March
- **RAILCARGO RU (1 supervision activity)**
 - One (1) supervision meeting - February
- **GFR RU (2 supervisory activities)**
 - One (1) inspection National Rules - December
 - One (1) supervision meeting - July
- **IM & all RUs (1 supervision activity)**
 - Joint supervision meeting - December

The outcomes of the above activities showed fifteen (15) cases of non-compliance and also five (5) areas for improvement indicated by the auditors of RAS.

The implementation of the required corrective actions for non-compliances is under surveillance by RAS.

7.3 Coordination and cooperation

There have been no discussions on supervision results with other NSAs during 2022.

7.4 Follow-up audit of the RAS performance and decision making by the European Railway Agency

Within the framework of Article 33 of Regulation (EU) 2016/796, RAS (2nd round of NSA inspections) was audited by a team of ERA inspectors, the scope of the audit being: a) the adequacy of the personnel performing supervision activities and assessing the applications for granting safety certificates and vehicle authorizations and b) the supervision of railway agencies. The initial contact took place on 19 February with a request to RAS and the submission of documents by RAS. The Opening meeting took place on 6 June 2022 via video call. An on-the-spot check took place from 27 June to 1 July 2022 at the premises of RAS. ERA's Draft Report was sent to RAS on 02 September. On 17 October, remarks were sent to ERA on the "draft" Inspection Report and Action Plan for the Non-Compliances identified during the inspection. For the completion of the Report and the Action Plan for the Non-Compliances an Exit Meeting took place on 4 November 2022. On 25 November 2022, the draft Inspection Report was submitted to RAS in electronic format together with the remarks/comments of the relevant RAS's Action Plans for Non-compliances and the inspection remarks, which were approved with RAS's Plenary Decision No 96/2022 (Reg. No 3473/24-11-2022).

The final Inspection Report of the 2nd round and the agreed upon action plan were sent to RAS on 21-12-2022. In the context of monitoring the implementation progress of the above action plan, in 2023, RAS started submitting to the Agency the relevant interim reports attaching the relevant objective evidence for the implementation of the Plan's activities, in order to remedy the inspection's findings.

At the same time, in 2022, RAS continued to implement the action plan of the Agency's 2019 inspection, performing relevant actions in order to remedy the remaining findings of the above inspection.

8. IMPLEMENTATION OF THE CSMs BY RUs & IMs

- 8.1 Application of Regulation (EU) 2018/762 on the CSM for the Safety Management System
- 8.2 Application of Regulation (EU) 402/2013 on the CSM for risk evaluation and assessment
- 8.3 Application of Regulation (EU) 1078/2012 on the CSM for the Safety Management System for Monitoring
- 8.4 Participation in and implementation of EU projects



8. IMPLEMENTATION OF THE CSMs BY RUs & IMs

8.1 Application of Regulation (EU) 2018/762 on the CSM for the Safety Management System

The implementation of the new JMD with regard to the requirements for the Safety Management System RUs and IMs must apply (Commission Regulation (EU) 2018/762) was carried out in Greece by Rail Cargo Logistics Goldair (RCLG) and HELLENIC TRAIN RUs in the context of issuance of the single safety certificate.

Rail Cargo Logistics Goldair (RCLG) S.A. RU submitted in August 2022, via OSS, a renewal application for its Single Safety Certificate with application ID No S-20220818-001 and service provision area in Greece up to the Kulata and Svilengrad cross-border stations within the Bulgarian territory. The application was submitted to ERA as it involved more than one state. The application was accompanied by evidence for the coverage of the SMS part, the Technical Specification for Interoperability for the Conduct and Management of Traffic (TSI CMT) and the national part with regard to the compliance with national rules in the safety sector. The Safety Management System (SMS), which is one of the accompanying documents of the application, was reviewed by a team of assessors appointed by ERA, a RAS officer included. Within this framework, RAS evaluated the national part of the application. The Safety Management System (SMS) met the requirements defined in Annex I to the Delegated Regulation (EU) 2018/762 and in the Implementing Regulation (EU) 2019/773. The relevant EU1020220294 single safety certificate was issued by the Agency on 20-12-2022, and was granted with the notification of Application Issues.

HELLENIC TRAIN RU submitted in August 2022, via OSS, a renewal application for its Single Safety Certificate with application ID No S-20220819-001 and service provision area in Greece up to the Kulata and Svilengrad cross-border stations within the Bulgarian territory. The application was submitted to ERA as it involved more than one state. The application was accompanied by evidence for the coverage of the SMS part, the Technical Specification for Interoperability for the Conduct and Management of Traffic (TSI CMT) and the national part with regard to the compliance with national rules in the safety sector. The Safety Management System (SMS), which is one of the accompanying documents of the application, was reviewed by a team of assessors appointed by EPA, a RAS officer included. Within this framework, RAS evaluated the national part of the application. The Safety Management System (SMS) met the requirements defined in Annex I to the Delegated Regulation (EU) 2018/762 and the Implementing Regulation (EU) 2019/773. The relevant [Regulatory Authority for Railways, 33 Stadiou str. | 105 57 Athens | \[info@ras-el.gr\]\(mailto:info@ras-el.gr\)](https://www.ras-el.gr/)

EU1020220295 single safety certificate was issued by the Agency on 21-12-2022, and was granted with the identification of problematic points (Application Issues).

8.2 Application of Regulation (EU) 402/2013 on the CSM for risk evaluation and assessment

The implementation of Regulation (EU) 402/2013 was part of RAS's supervision activity in 2022. In accordance with the approved supervision plan two inspections took place at two RUs, one supervision meeting and one joint supervision meeting:

- An inspection team of RAS's officers visited the HELLENIC TRAIN RU premises in application of Regulation (EU) 402/2013 regarding the Common Safety Method (CSM) for risk assessment. In this context, information was requested about the actions taken for possible changes in the RU's operation. The RU's officers mentioned that a Risk Assessment was performed about the new ETR470 rolling stock pursuant to (EU) 402/2013 provisions.
- An inspection team of RAS's officers visited the STASY RU premises in application of Regulation (EU) 402/2013 regarding the Common Safety Method (CSM) for risk assessment.

In this context an exchange of views took place about the requirements of said regulation mentioned under "Significant Changes". The Inspection Team suggested that initially changes be recorded by the heads of the RU's department without their significance being necessarily mentioned. Later this list may be the object of a review meeting. Finally, it was noted that on ERA's website there are manuals explaining the regulation and examples for its implementation.

- At the 1st Supervision Meeting with HELLENIC TRAIN RU in 2022, the implementation of the Common Safety Method (CSM) was discussed regarding the risk assessment (Implementing Regulation (EU) 402/2013). The officers of RAS informed the officers of the RU that examples of implementation of the criteria of Article 4(2) of the above Regulation for the assessment of changes, and in general examples of risk assessment, can be found in a document issued by ERA. The document was shared to the officers of the RU and it was recommended that it be taken into account. The officers of RAS also urged the representatives of the RU, initially, to turn to all the departments related to rail safety in their company and request a list with the changes.

- At the joint supervision meeting that took place on 22 December with the presence of representatives of all the Rail Entities, the implementation of Regulation (EU) 402/2013 was included as a subject. As regards the requirements of said regulation the officers of RAS specifically mentioned the "Significant Changes". They initially requested that changes be recorded by the heads of the RO's departments without their significance being mentioned. As regards the significance of change, they mentioned that it is regardless of its nature (positive or negative). The following were presented as examples of changes: Extension of activities of a commercial services RU to passenger transport as well (there is an impact to safety), low speed transport services to high speed (there is an impact on safety), changes of an administrative nature (usually there is no impact on safety).

The officers of RAS indicated to the representatives of the rail sector the existence of a guide by ERA containing examples of significant and non significant changes regarding safety. It should be taken into account for the preparation, in collaboration with the departments of the companies that are related to safety, of lists of changes, that have been made and regard railway safety and which must later be submitted to RAS. The above guide of ERA "Collection of examples of risk assessments and possible tools supporting the CSM Regulation" can be found at ERA's website, see link https://www.era.europa.eu/domains/common-safety-methods/risk-evaluation-assessment-csm_en, and studying it is a first step to understanding Regulation (EU) 402/2013 and gradually start implementing it.

The officer of HELLENIC TRAIN shared that (EU) 402/2013 was implemented as regards the new ETR470 rolling stock.

RAS will continue monitoring the implementation of (EU) 402/2013 in the coming years.

8.3 Application of Regulation (EU) 1078/2012 on the CSM for the Safety Management System for Monitoring

The implementation of Regulation (EU) 1078/2012 was part of RAS's supervision activity in 2022 in accordance with the authorized supervision plan. An audit team comprised by RAS officers visited the offices of HELLENIC TRAIN RU in order to assess its continuous compliance with the requirements of the criteria of Annex I to Regulation (EU) 2018/762 and with the requirements of the relevant Safety Management System (SMS) with regard to the requirements of Regulation (EU) 1078/2012. In accordance with the inspection

report the RU has been informed about Regulation (EU) 1078/2012 and makes efforts to comply with it, although there is still room for improvement.

During the assessment of the application of HELLENIC TRAIN RU by ERA for granting the Single Safety Certificate problematic issue S-20220819-001-00 was recorded as regards the Common Safety Method for the monitoring of Regulation 1078/2012. According to the open point "*The monitoring process shall contain the definition of a strategy, priorities and plans for the whole process. It must be linked to other crucial processes of the SMS and cover issues related to the safety culture as well as with human and organisational factors. Improvements of those parts of the SMS shall be deemed as linked and be made in the context of a structured action plan*".

The RU in order to implement the corrective actions of the open points, submitted an action plan to ERA during the process of the granting of a single certificate. The monitoring of the action plan is implemented by RAS.

In the coming years, RAS will continue auditing the implementation of Regulation (EU) 1078/2012 and it will be re-included as a supervision activity in the supervision plan 2023 with HELLENIC TRAIN in the context of inspection of the above action plan but also for other Railway Operators as well.

8.4 Participation in and implementation of EU projects

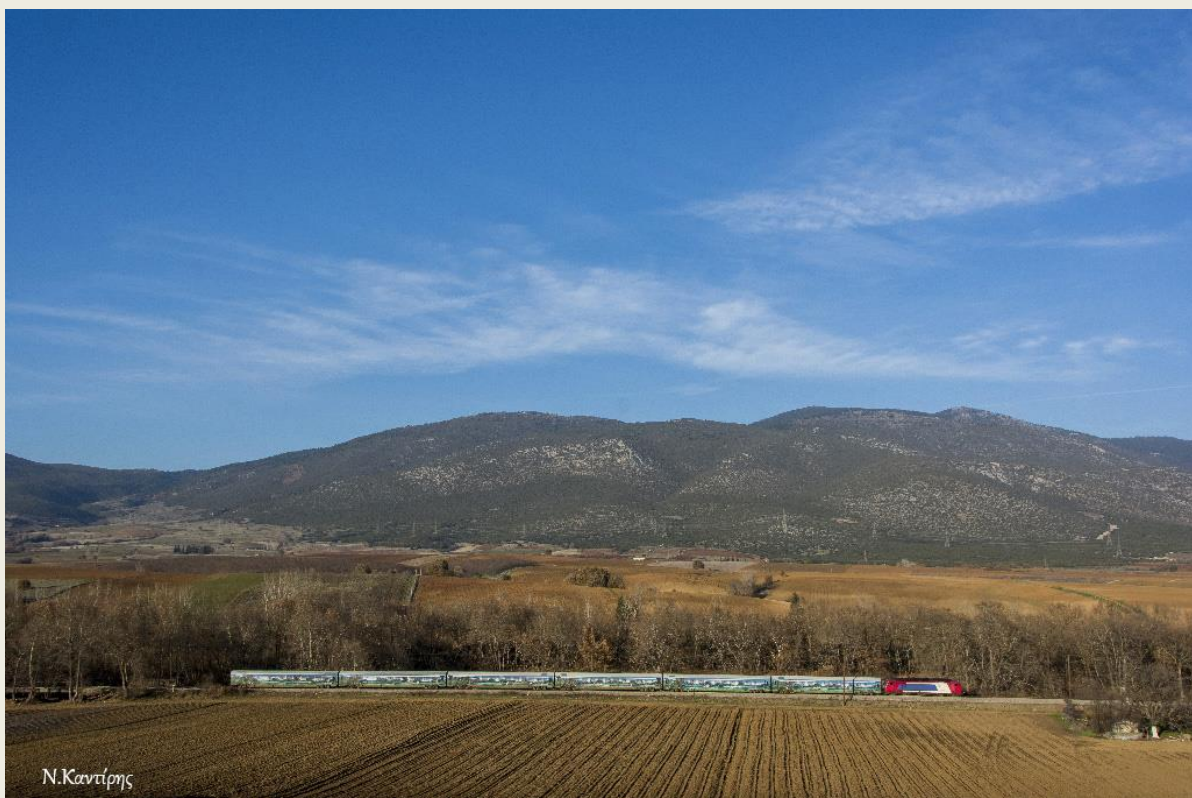
Not applied.

9. SAFETY CULTURE

9.1 Safety Culture Assessment and Surveillance

9.2 Safety Culture Initiatives/Projects

9.3 Safety Culture Communication



9. SAFETY CULTURE

9.1 Evaluation and Monitoring

The Fourth Railway Package, and in particular the Directive on railway safety, [Directive (EU) 2016/798] requires that Member-States promote a culture of mutual trust, good faith and learning. Through the Safety Management Systems implemented, railway undertakings and infrastructure managers are called to promote the above culture with staff being encouraged to contribute to the development of safety.

The development of a safety culture and its manner of promotion was an area of supervision activity for RAS in 2022. In accordance with the approved supervision plan, an inspection of the RU took place as well as one joint supervision meeting.

- An inspection team of RAS's officers visited the HELLENIC TRAIN RU premises regarding the promotion of the safety culture. In accordance with the assessors' report the RU has been informed about the Safety Culture and the RU's new Administration and the officers' of the Safety and Certification Directorate effort to promote the Safety Culture is obvious, as is their commitment to this direction. However, further improvement of the Safety Culture is required for the RU, in the context of which a discussion and exchange of views took place between the inspection team of RAS and the RU's officers.
- At the joint supervision meeting that took place on 22 December 2022 with the presents of all the Rail Entities, Information by the RO for actions regarding the implementation of Safety Culture was included.

As regards safety culture actions HELLENIC TRAIN officers mentioned that a survey took place among the personnel (approximately 700 persons) and the results are expected.

An officer of OSE mentioned that a survey was carried out involving all staff using a questionnaire. The survey regarded operation officers and administration personnel and there was an effort for the greatest possible participation of employees performing crucial safety tasks, officers of Directorates responsible for safety issues, etc. The collection of data shall show the needs for actions regarding the establishment of a safety culture, such as trainings/briefings on the safety culture etc.

9.2 Safety Culture Initiatives / Projects

- RAS notified to all railway operators the new ERA guide "SMS Requirements Guide - v.1.3_EL" which particularly emphasises the incorporation of a safety mindset in the operators' operation.
- During the 1st Supervision Meeting with HELLENIC TRAIN RU in 2022, ERA's new guide "SMS Requirements Guide - v.1.3_EL", which had recently been shared with all the RUs by RAS, was discussed. The officers of RAS pointed out the importance of the guide, which may be used by the RU for the submission of a correct and documented SSC application. Furthermore, said guide provides important information and full guidance for monitoring the RU's SMS via internal inspections and audits and the assessment thereof during the term of validity of the SSC.
- HELLENIC TRAIN RU participates every six (6) months with a presentation (markers, actions, best practices) in a Safety Workshop organised by parent company TRAINITALIA. The above workshop takes place in Rome. On 18-05-2022 a Safety Culture Meeting took place in Rome with the participation of the whole Group with the aim to improve the Safety Culture. HELLENIC TRAIN provided to the officers of RAS the presentation of the company at the above meeting in the context of the relevant inspection regarding safety culture that took place at the RU's premises.

9.3 Safety Culture Communication

In 2022, RAS wishing to get closer to the Greek society on issues of safety in the railway sector, undertook the following initiatives and actions:

- For the third consecutive year, RAS, in cooperation with the "Panos Mylonas" Road Safety Institute participated in the events of the "International Level Crossing Awareness Day (ILCAD 2022)", which was held on 09 June 2022 and is organised by the International Union of Railways (UIC). RAS and the Panos Mylonas Institute issued a joint press release and produced a poster.
- RAS created an information program for the prevention of accidents on the railway network entitled: "Safe co-existence of students with the railway network". The programme is addressed to students of primary schools and secondary schools located near the railway network. The programme is available via RAS's website (<https://ras-el.gr/enhmerwsou/>). The programme is approved by the Ministry of Education following a request by RAS. The submission of an application for the school year 2022-2023 was not possible because of the COVID-19 pandemic.



**ΜΗ ΡΙΣΚΑΡΕΙΣ
ΤΗ ΖΩΗ ΣΟΥ**

ΔΙΕΘΝΗΣ ΗΜΕΡΑ
 ΕΥΑΙΣΘΗΤΟΠΟΙΗΣΗΣ
 ΓΙΑ ΤΗΝ ΑΣΦΑΛΕΙΑ
 ΣΤΙΣ ΙΣΟΠΕΔΕΣ ΔΙΑΒΑΣΕΙΣ
9 ΙΟΥΝΙΟΥ 2022

**ΣΤΑΣΟΥ ΜΑΚΡΙΑ
ΑΠΟ ΤΙΣ ΓΡΑΜΜΕΣ
ΤΟΥ ΤΡΕΝΟΥ!**

ILCAD

Κινούμαι με προσοχή στις ισόπεδες διαβάσεις!










THEME CHAPTER



Not applied.

ANNEX PROGRESS WITH INTEROPERABILITY



ANNEX I: Progress with interoperability

1. Lines excluded from the scope of IOP/SAF Directive (end of year)

1a	Length of lines excluded from the scope of application of the IOP Directive [km]	115.30
1b	Length of lines excluded from the scope of application of the SAF Directive [km]	115.30

Please provide the list of lines excluded:

2. Length of new lines authorized by NSA (during the reporting year)

2a	Total length of lines with ETCS [km]	282.70
2b	Total length of lines with GSM-R [km]	836.96

3. PRM adapted stations (end of year)

3a	PRM TSI compliant railway stations	0
3b	PRM TSI compliant railway stations - partial TSI compliance	2
3c	Accessible railway stations	40
3d	Other stations	208

4. Train driver licenses (end of year)

4a	Total number of valid European licenses issued in accordance with the TDD	300
4b	Number of newly issued European licenses (first issuance)	72

5. Number of vehicles authorized under the interoperability Directive (EU) 2008/57 (during the reporting year)

5a	First authorization – total	
5aa	Wagon	
5ab	Locomotives	
5ac	Hauled passenger vehicles	
5ad	Fixed or pre-defined formation	
5ae	Special vehicles	
5b	Additional authorization – total (new according to (EU) 2016/797)	7
5ba	Wagon	
5bb	Locomotives	2
5bc	Hauled passenger vehicles	
5bd	Fixed or pre-defined formation	5
5be	Special vehicles	

5c	Type authorization – total (C2T according to (EU) 2016/797)	34
5ca	Wagon	
5cb	Locomotives	
5cc	Hauled passenger vehicles	
5cd	Fixed or pre-defined formation	34
5ce	Special vehicles	
5d	Authorizations granted after upgrade or renewal - total	
5da	Wagon	
5db	Locomotives	
5dc	Hauled passenger vehicles	
5de	Fixed or pre-defined formation	
5df	Special vehicles	

6. ERTMS adapted stations (end of year)

6a	Tractive vehicles including trainsets equipped with ERTMS (ETCS only)	36
6b	Tractive vehicles including trainsets – no ERTMS	5

7. Number of NSA staff (full time equivalent employees) by the end of year

7a	FTE staff involved in safety certification	
7b	FTE staff involved in vehicle authorization	2
7c	FTE staff involved in supervision	
7d	FTE staff involved in other railway-related tasks	

Appendix to Annex I: Definitions – Progress with interoperability

Applicable definitions are those contained in the relevant articles of the legal documents.

In addition, the following definitions apply:

1. Lines excluded from the scope of IOP/SAF Directive (end of year)

Railway lines excluded by the Member States from the scope of the application of RSD/IOD: DIRECTIVE (EU) 2015/797, Art. 4 a-d; DIRECTIVE (EU) 2015/798, Art. 3 a-d, as of 31.12.20xx (reporting year).

2. Length of new lines authorized by NSA (during the reporting year)

Length of lines constituting the Union rail system authorized for placing in service in accordance with Article 18(2) of Directive (EU) 2015/797 during the reporting year.

3. PRM adapted stations (end of year)

Railway stations as of 31.12.2019 (reporting year), that complies with the requirements of the Commission Regulation (EU) No 1300/2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility (PRM TSI).

Full TSI compliance means full conformity with PRM TSI requirements, as demonstrated with the NoBo certificate. Partial TSI compliance means conformity with some (but not all) PRM TSI requirements, as demonstrated with the NoBo certificate. Accessible station means a station considered accessible under national legislation. (No NoBo certificate available.).

Railway station means a location on a railway system where a passenger train service can start, stop or end.

4. Train driver licenses (end of year)

Newly issued and valid driver licenses as of 31.12.2019 (reporting year), issued in accordance with the Directive 2007/59/EC of the European Parliament and of the Council of 23 October 2007 on the certification of train drivers operating locomotives and trains on the EU railway system.

5. Number of vehicles authorized under the interoperability Directive (EU) 2008/57 (during the reporting year)

The number of issued, renewed and amended vehicle authorizations for placing on the market in accordance with Article 21(8) of Directive (EU) 2015/797 during the reporting year.

6. ERTMS adapted stations (end of year)

Number of operated tractive vehicles (owned, leased, and rented minus rented-out) equipped with ETCS.

Vehicles without power units are excluded. Multiple units to be counted once. Includes only vehicles which are operated to transport freight or passengers. Yellow fleet and other IM vehicles are not included. Includes only vehicles which are registered in the country of main business activities of RUs.

7. Number of NSA staff (full time equivalent employees) by the end of year

Total number of full time equivalent NSA employees as of 31.12.2019 (reporting year).

Only staff dealing with railways is to be included

ANNEX II: ACRONYMS AND DEFINITIONS

Acronym	Meaning
GKK	General Traffic Regulation
DDEA	National Passport and Secure Document Centre
IM	Infrastructure Manager
NSA	National Safety Authority
EU	European Union or European Commission
EESSTY	Hellenic Company for Rolling Stock Maintenance
EMAM	National Register of Train Driver Licences
CSI	Common Safety Indicators
KEE	Central Examination Committee
KEK	Vocational Training Centre
CSM	Common Safety Methods
JMD	Joint Ministerial Decision
RSIU	Rail Safety & Interoperability Unit
PD	Presidential Decree
RAS	Regulatory Authority for Railways
HSRL	High-Speed Railway Line
SMS	Safety Management System
RU	Railway Undertaking
TSI	Technical Specification for Interoperability
ECM	Entity in Charge of Maintenance
YYM	Ministry of Infrastructure and Transport
Gov. Gaz.	Government Gazette
ASBO	Assessment Body
DEBO	Designated Body
ERA	European Railway Agency
ERADIS	European Railway Agency Database for Interoperability and Safety
ERTMS	European Railway Traffic Management System
ETCS	European Train Control System
GSMR	Global System Mobile for Railways
NIB	National Investigation Body
NSA	National Safety Authority