

OPINION

2022-1

OF THE EUROPEAN UNION AGENCY FOR RAILWAYS

for

Lithuania

regarding

a draft national rule of Lithuania on requirements on route knowledge under the national transposition of Directive 2007/59/EC

Disclaimer:

The present document contains an opinion of the European Union Agency for Railways pursuant to Chapter 5 of Regulation (EU) 2016/796 related to the Agency's tasks concerning national rules. It does not represent the view of other EU institutions and bodies, and is without prejudice to the decision-making processes foreseen by the applicable EU legislation. Furthermore, a binding interpretation of EU law is the sole competence of the Court of Justice of the European Union.

1. General Context

In line with article 25 (3) of Regulation 2016/796, this opinion covers the examination of a draft national rule of Lithuania by the Agency leading to a negative assessment.

This opinion is addressed to Lithuania with a copy to the European Commission. It is uploaded on the Single Rules Database (SRD).

2. Legal Background

Article 25 (2) and (3) of Regulation (EU) 2016/796 of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Railways and repealing Regulation (EC) No 881/2004¹ (Agency Regulation) sets out the following:

“2. Where, after the examination referred to in paragraph 1, the Agency considers that the draft national rules enable the essential requirements for railway interoperability to be fulfilled, the CSMs and TSIs in force to be respected and the CSTs to be achieved, and that they would not result in arbitrary discrimination or a disguised restriction on rail transport operations between Member States, the Agency shall inform the Commission and the Member State concerned of its positive assessment. In that case, the Commission may validate the rules in the IT system referred to in Article 27.

Where the Agency within 2 months of receipt of the draft national rule or within the extended time period agreed in accordance with paragraph 1 does not inform the Commission and the Member State concerned of its assessment, the Member State may proceed with the introduction of the rule without prejudice to Article 26.

3. Where the examination referred to in paragraph 1 leads to a negative assessment, the Agency shall inform the Member State concerned and ask it to state its position regarding that assessment. If, following that exchange of views with the Member State concerned, the Agency maintains its negative assessment, the Agency shall within a maximum period of 1 month:

(a) issue an opinion addressed to the Member State concerned, stating the reasons why the national rule or rules in

question should not enter into force and/or be applied; and

(b) inform the Commission of its negative assessment, stating the reasons why the national rule or rules in question

should not enter into force and/or be applied...”

This opinion is issued pursuant to Article 25 (3 a) of the Regulation (EU) 2016/796.

This opinion points out the fact that the draft national rule² of Lithuania, namely one point in the proposed amendment of Order N° 3-297 of the Minister for Transport and Communications of the Republic of Lithuania of 17 July 2006 approving the description of requirements for railway traffic safety management systems contradicts already harmonised European legislation according to the analysis and the Annex to this opinion.

The applicable EU legislation which is relevant for this opinion is:

- Directive 2007/59/EC of 23 October 2007 on the certification of train drivers operating locomotives and trains on the railway system in the Community
- Commission implementing Regulation (EU) No 402/2013 of 30 April 2013 on the common safety method for risk evaluation and assessment and repealing Regulation (EC) No 352/2009
- Directive (EU) 2016/798 of 11 May 2016 on railway safety

¹ OJ L 138, 26.5.2016, p. 1.

² Rule ID LT-SA-203-1-D (reference in SRD)

- Commission delegated Regulation (EU) 2018/762 of 8 March 2018 establishing common safety methods on safety management system requirements pursuant to Directive (EU) 2016/798 of the European Parliament and of the Council and repealing Commission Regulations (EU) No 1158/2010 and (EU) No 1169/2010
- Commission implementing Regulation (EU) 2019/773 of 16 May 2019 on the technical specification for interoperability relating to the operation and traffic management subsystem of the rail system within the European Union and repealing Decision 2012/757/EU

3. Analysis

Lithuania notified a draft safety rule in the SRD³ on the 13th of December 2021. This draft rule is an amendment of Order N° 3-297 of the Minister for Transport and Communications of the Republic of Lithuania of 17 July 2006 approving the description of requirements for railway traffic safety management systems.

According to Lithuania “point 1.2.1 of the draft Order is intended to make risk analysis and assessment mandatory, as laid down in Regulation (EU) No 402/2013, when railway infrastructure managers, railway undertakings (carriers) or other undertakings (legal persons, other organisations, branches of legal persons or other organisations) which use railway infrastructure without having obtained a licence from a railway undertaking (carrier) use railway infrastructure during manoeuvring and⁴/or travelling to or from the place of construction, repair and/or maintenance of railway infrastructure facilities (hereinafter referred to as “the other undertaking”) to take decisions on the training of persons wishing to obtain train drivers’ certificates.”

This draft rule was notified in SRD as a type 3 draft national safety rule, more specifically on requirements on route knowledge under the national transposition of Directive 2007/59/EC (the Train Driver Directive or TDD) as amended (Train Driver Directive).

The Agency negatively assessed the rule in the SRD on the 2nd of February 2022, based on the following arguments:

The Train Driver Directive has been in force since 2007 and since then there is newer EU legislation available and applicable. Its Annex III sets the training method whilst Annex IV the general requirements regarding the train driver license.

TSI OPE⁵ point 1 of Appendix I 'Requirements on route knowledge under the national transposition of Directive 2007/59/EC (Train Driver Directive) lists all permissible areas for which there is space for introduction of national rules; in other words, this TSI point allows the introduction of national requirements linked to the infrastructure, e.g. specifications on the signalling system and more in general integrate point (3) of annex IV of the Train Driver Directive. However, this point does not allow the introduction of a specific method of training/examination since such methods are already defined in annex III of the Train Driver Directive and in the following EU legislation Directive (EU) 2016/798 and Regulation 2018/762 (see below).

³ Rule ID LT-SA-203-1-D (reference in SRD)

⁴ Commission Implementing Regulation (EU) No 402/2013 of 30 April 2013 on the common safety method for risk evaluation and assessment and repealing Regulation (EC) No 352/2009, as last amended by Commission Implementing Regulation 2015/1136 of 13 July 2015.

⁵ Commission implementing Regulation (EU) 2019/773 of 16 May 2019 on the technical specification for interoperability relating to the operation and traffic management subsystem of the rail system within the European Union and repealing Decision 2012/757/EU

In addition, Article 4 (3) of Directive (EU) 2016/798 on Railway Safety (RSD) gives the responsibility to the Railway Undertakings and Infrastructure Managers regarding the implementation of risk control measures.

Moreover, point 3.1.1 of Regulation (EU) 2018/762 states that the organisation shall identify and analyse all operational and technical risks relevant to the character and extent of operations carried out by the organisations. Such risks shall include those arising from human and organisational factors such as workload, job design, fatigue or suitability of procedures, and the activities of other interested parties.

Point 4.2.1 of Regulation (EU) 2018/762 states that the organisation's competence management system shall ensure that staff having a role that affects safety are competent in the safety-related tasks for which they are responsible.

According to existing European legislation as described in this opinion, it is up to the operator's safety management system to define such provisions. For this reason, the draft rule of Lithuania cannot be accepted.

On the 21st of February 2022, Lithuania notified the Agency in SRD its rejection of the Agency's negative assessment as summarised above. Lithuania clarified its following position :

“The entity which employ train drivers, should carry out an analysis of the impact of its decisions to change (introduce new, abolish) the requirements for certificate training according to the steps defined within Regulation (EU) 402/2013. The proposed rule would not oblige the persons concerned to apply a specific method of training/examination; rather it would oblige to make a risk-based decision about what specific methodes, defined in annex III of the Tran Driver Directive and their combination to apply. Willing to guarantee that infrastructure managers or railway undertakings do not impose low and insufficient requirements for train driver's training, we do propose a mandatory risk analysis and assessment when making a decision on what training methodes to apply.” The Member State also claims that the rule is rather in line than contradictory to the notions of Directive (EU) 2016/798 and Regulation (EU) 2018/762. The rule supplements the legal framework but does not duplicate it. Regulation (EU) 402/2013 is in force therefor operators shall apply it. The Member State would like to ‘re-notify the proposed rule to perform risk analysis and assessment as set up in the Regulation (EU), when making the decisions on the training of persons wishing to be certified as a driver of a train, as a national rule allowed by the Regulation (EU) 402/2013.”

In relation to the position of Lithuania:

The Agency remains with its opinion based on following argumentation:

The definition of the competencies of staff involved in safety operations is closely linked to the role, responsibilities and risks within their operational management. Consequently, there shall always be a link between the output of the risk management process and the definition of specific competences of personnel involved in safety tasks. Managing risks is the responsibility of the railway operators and not of the Member State as defined in the Directive (EU) 2016/798 Art. 4 (3).

Furthermore, Directive (EU) 2916/798 Art. 4 (4) defines that contracting entities shall implement the necessary risk control measures, where appropriate in cooperation with other actors.

In line with this, the Regulation (EU) 2018/762 gives the responsibility of managing risks to the Railway Undertakings and Infrastructure Managers. Moreover, the Regulation (EU) 2018/762 states very clear that the organisation's competence management system shall ensure that staff having a role that affects safety are competent in the safety-related tasks for which they are responsible. This also covers the train driver's certificate. The generic process for risk assessment is as such already foreseen in EU legislation and is implemented in the safety management system.

Furthermore, Regulation (EU) 402/2013 shall apply to the proposer as defined in Article 3(11) when making any change to the railway system in a Member state. This process is not appropriate for normal operations.

This rule cannot be a basis for a national safety rule. However, it is important that the railway undertaking/infrastructure manager takes into account all risk factors in their operational context when deciding what is good practice and what could be accepted.

4. Lithuania has been informed of the position of the Agency via the SRD. The opinion

The Agency considers that the draft national safety rule is not compliant with the relevant EU legal requirements.

The Agency considers that the draft national safety rule is not in compliant with the relevant EU legal requirements.

In accordance with article 25 (3) of Regulation 2016/796, the opinion covers the examination of draft national rules of Lithuania by the Agency leading to a negative assessment.

The Annex 1 provides Lithuania:

- The list of actions to be taken into account,
- An assessment table with :
 - o The national rule,
 - o The Agency assessment of the requirement and the reasons why this is not accepted,
 - o The status of the assessment indicating whether the requirement should be modified or repealed.

This opinion is addressed to Lithuania, uploaded in the SRD with a copy to the European Commission

Valenciennes, 09/03/2022

Signed

Josef DOPPELBAUER
Executive Director

ANNEX 1 Examination of draft national rule leading to negative assessment

The national rules related to the use of risk assessment as defined in the draft national rule order N° 3-297 of the Minister for Transport and Communications of the Republic of Lithuania of 17 July 2006 approving the description of requirements for railway traffic safety management systems.

This rule cannot be a basis for the NSA or the infrastructure manager to impose National rules. However, it is important that the RU takes into account all the risk factors in their operational context when deciding what is good practice and what could be adopted.

Lithuania has been informed of the position of ERA via the Single Rules Database (SRD).

The table below presents the applicable EU rule based on which the evaluation performed by the Agency lead to a negative assessment

Subsystem		National rules and acceptable means of compliance	Examination of national rules and acceptable means of compliance leading to a negative assessment	Agency assessment status
OPE	Other rules not covered by the TSI OPE (e.g. potential area for national rules)	<p>Annex III of the Train Driver Directive sets the training method whilst annex IV sets the general requirements regarding the train driver license. TSI OPE appendix I 'Requirements on route knowledge under the national transposition of Directive 2007/59/EC (Train Driver Directive) can be used to introduce national requirements linked to the infrastructure, e.g. specifications on the signalling system and more in general integrate point (3) of annex IV of the Train Driver Directive.</p> <p>Art. 4 of Directive (EU) 2016/798: Member states shall ensure that the responsibility for the safe operation of the Union rail system and the control of risks associated with it is laid upon the infrastructure managers and railway undertakings each for its part of the system. Following the same Article also contracting entities shall implement the necessary risk control measures, where appropriate in cooperation with other actors.</p> <p>Also annex I point 3.1.1.1 of the Regulation (EU) 2018/762 states the following: organisations identify and analyse all operational, organisational and technical risks and evaluate the risks by applying</p>	<p>Agency: TSI OPE annex I point 'requirements on route knowledge under the national transposition of Directive 2007/59/EC cannot be used to introduce a specific method of training/examination since this is already defined in annex III of the Train Driver Directive and in the following EU legislation Directive 2016/798 and Regulation 2018/762</p> <p>Moreover, the rules for risk assessment are the sole responsibility of the infrastructure managers and railway undertakings. These requirements must be ensured through the safety management system of the IM/RU.</p>	Not accepted, the national rule should not enter into force

		<p>appropriate risk assessment methods. Additional point 4.2 refers to the requirements of the competence management system.</p> <p>Regulation (EU) 402/2013 shall apply to the proposer as defined in Article 3 (11) when making any change to the railway system in a Member state. This process is not appropriate for normal operations.</p>		
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ANNEX 2 The original request uploaded in SRD

Rule ID LT-SA-203-1-D can be consulted on following link:

[SRD - Single Rules Database \(europa.eu\)](https://europa.eu/srd)

ANNEX 3 Light impact assessment**Light Impact Assessment**

A draft national rule of Lithuania on requirements on route knowledge under the national transposition of Directive 2007/59/EC

Accompanying Agency Opinion 2022-1

	<i>Elaborated by</i>	<i>Validated by</i>	<i>Approved by</i>
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<i>Date</i>	03/03/2022	07/03/2022	09/03/2022
<i>Signature</i>			

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1. Context and problem definition
1.1. Problem and problem drivers
<p>Lithuania has notified a draft national rule and following a first examination the Agency concluded with a negative assessment. As per Art. 25(3) of Regulation (EU) 2016/796 the Agency is addressing an Opinion to Lithuania. According to Art. 8(1) of Regulation (EU) 2016/796, this impact assessment is accompanying the Agency Opinion.</p> <p>The problem to be assessed refers to the intention of Lithuania to adopt a national rule that would oblige RUs/IMs to perform a mandatory risk analysis and assessment when deciding what training methods shall be applied to train drivers.</p> <p>From the evidence available from the Lithuanian authorities, it is unclear what the problem drivers or root causes are.</p>
1.2. Evidence of the problem
<p>There is no clear evidence of the problem nor of its magnitude. The Lithuanian authorities justify their request for a national rule with the aim to <i>'improve traffic safety and smooth and uninterrupted rail traffic by establishing standardised and risk-based decision-making on the training of persons applying for train driving certificates'</i>. However, no evidence supporting this statement with regards to safety concerns and interoperability or uninterrupted rail traffic is available. Therefore, it is unclear if the intention of Lithuania to introduce a national rule is driven by safety concerns, follow-up of specific incidents occurred, unavailability of drivers affecting rail traffic or if the national rule is being considered as a preventive measure to address the alleged problems.</p>
1.3. Baseline scenario
<p>Given no evidence of the problem is available, it is not possible to assess possible evolution of the problem. The baseline scenario (Option 0) is the current situation of the EU and national legal framework in Lithuania where the new national rule is not adopted.</p>
1.4. Main assumptions
<p>It is assumed that the Lithuanian authorities perceive a low safety level and/or poor training of drivers due to insufficient risk-based training methods applied by RUs/IMs.</p>

4.5. 1.5. Stakeholders affected			
Railway undertakings (RU)	<input checked="" type="checkbox"/>	Member States (MS)	<input checked="" type="checkbox"/>
Infrastructure managers (IM)	<input checked="" type="checkbox"/>	Third Countries	<input type="checkbox"/>
Track-side maintenance providers (TM)	<input checked="" type="checkbox"/>	National safety authorities (NSA)	<input checked="" type="checkbox"/>
Licensing entities for train drivers (LE)	<input type="checkbox"/>	European Commission (EC)	<input checked="" type="checkbox"/>
Training centres for train drivers (TC)	<input checked="" type="checkbox"/>	European Union Agency for Railways (ERA)	<input checked="" type="checkbox"/>
Train drivers (TD)	<input checked="" type="checkbox"/>	Passengers	<input type="checkbox"/>
<p>Beside institutions and authorities, the stakeholders impacted are mostly those active in the Lithuanian market as local entities/individuals or as international entities providing cross-border rail services into Lithuania. Track-side maintenance providers are impacted to the extent that they employ drivers for their operations using yellow fleet trains. LE are not impacted since the problem being addressed would impact only the drivers' certificates issued according to Art. 13 of Directive (EU) 2007/59/EC.</p>			
4.6. 1.6. Subsidiarity and proportionality			
<p>In order to preserve interoperability and ensure a harmonised legal framework for the rail sector, according to Art. 8 of Directive (EU) 2016/798 Member States are not anymore allowed to freely adopt national safety rules except in those few cases provided by EU legislation. The problem therefore cannot be addressed by Lithuania and it is being dealt with EU level action as per Art. 25 of Regulation (EU) 2016/796.</p>			

2. Objectives**4.7. 2.1. Specific objective**

The specific objective of this initiative is to provide Lithuania with an assessment of the problem defined above with regards to the draft national rule on train drivers being addressed to the Agency. This rule is having an impact on interoperability and market access.

3. Options**4.8. 3.1. List of options**

Option 0 is the baseline scenario as described above.

Option 1 is the option where the Agency reconsiders its negative assessment of Lithuania's draft national rule delivered as per Art. 25(3) of Regulation (EU) 2016/796.

4. Impacts of the options**4.9. 4.1. Qualitative analysis****Stakeholder assessment**

<i>Option 0 (Baseline)</i>			
<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
RU	Positive	The current legal framework is preserved and training requirements for drivers are set according to each company's Safety Management System as per EU law.	Very positive
	Negative	N/A	
IM	Positive	The current legal framework is preserved and training requirements for drivers are set according to each company's Safety Management System as per EU law.	Very positive
	Negative	N/A	

TM	Positive	The current legal framework is preserved and training requirements for drivers are set according to each company's Safety Management System as per EU law.	Very positive
	Negative	N/A	
TC	Positive	The current legal framework is preserved and training courses and methods for drivers are designed according to the Safety Management System of RUs/IM/TMs.	Very positive
	Negative	N/A	
TD	Positive	The current legal framework is preserved and training courses are to be followed according to the Safety Management System of RUs/IM/TMs.	Very positive
	Negative	N/A	
MS	Positive	No new national rule is to be drafted, submitted and discussed with ERA.	Neutral
	Negative	The idea of solving through national rules, instead of oversight, a perceived low safety level and/or poor training of drivers due to insufficient training methods applied by RUs/IMs remains.	
NSA	Positive	No new national rule is to be considered.	Neutral
	Negative	The idea of solving through national rules, instead of oversight, a perceived low safety level and/or poor training of drivers due to insufficient training methods applied by RUs/IMs remains.	
EC	Positive	The current legal framework with tendency to reduce national rules is preserved and training requirements for drivers are set according to the companies' Safety Management System as per EU law.	Very positive
	Negative	N/A	
ERA	Positive	The current legal framework and interoperability is preserved and training requirements for drivers are set according to the companies' Safety Management System as per EU law.	Very positive
	Negative	N/A	
<i>Option 1</i>			
<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
RU	Positive	The national rule is to be followed as a legal requirement and training of drivers is not to be specified only in each company's Safety Management Systems. Issuing drivers' certificates is made more complex.	Very negative
	Negative	The legal framework to operate in Lithuania is modified and training requirements for drivers have to follow local regulations potentially	

		deviating from the company's Safety Management Systems. All RUs have to follow the local regulations for drivers training instead of adapting methods to the operational risks of individual companies. Overall training costs are expected to increase. Additional effort needed also to show compliance with the national rule on drivers training on top of the remaining obligations pertaining to the company's Safety Management Systems.	
IM	Positive	The national rule is to be followed as a legal requirement and training of drivers is not to be specified only in the company's Safety Management Systems. Issuing drivers' certificates is made more complex.	Very negative
	Negative	The legal framework to operate in Lithuania is modified and training requirements for drivers have to follow local regulations potentially deviating from the company's Safety Management Systems. All IMs have to follow the local regulations for drivers training instead of adapting methods to the operational risks of individual companies. Overall training costs are expected to increase. Additional effort needed also to show compliance with the national rule on drivers training on top of the remaining obligations pertaining to the company's Safety Management Systems.	
TM	Positive	The national rule is to be followed as a legal requirement and training of drivers is not to be specified only in the company's Safety Management Systems.	Very negative
	Negative	The legal framework to operate in Lithuania is modified and training requirements for drivers have to follow local regulations potentially deviating from the company's Safety Management Systems. All TMs have to follow the local regulations for drivers training instead of adapting methods to the operational risks of individual companies. Overall training costs are expected to increase and TMs may be not allowed to run yellow fleet trains using own drivers. Additional effort needed also to show compliance with the national rule on drivers training on top of the remaining obligations pertaining to the company's Safety Management Systems.	
TC	Positive	Training programmes can be standardised locally for all drivers and all RUs/IM/TMs.	Rather negative
	Negative	Local regulations prevail making the use of international practices for training more difficult.	
TD	Positive	Training programmes to follow can be standardised locally for all drivers and all RUs/IM/TMs. Obtaining drivers' certificates can be made easier	Rather negative

		thanks to standardisation thus allowing higher transferability of drivers across employing undertakings.	
	Negative	Local regulations prevail making the use of international practices for training more difficult. Overall training costs are expected to increase.	
MS	Positive	N/A	Rather negative
	Negative	Important effort to mandate and design drivers' training programmes requirements. New effort needed to ensure enforcement of the national rule on top of all other existing oversight requirements pertaining to EU law.	
NSA	Positive	N/A	Rather negative
	Negative	Important effort to mandate and design drivers' training programmes requirements. New effort needed to ensure enforcement of the national rule on top of all other existing oversight requirements pertaining to EU law.	
EC	Positive	N/A	Very negative
	Negative	The current legal framework with tendency to reduce national rules is not preserved and training requirements for drivers are set according to national rules thus creating an evolution of the framework going opposite of the policy goal to reduce national rules at the benefit of interoperability.	
ERA	Positive	N/A	Very negative
	Negative	The current legal framework with tendency to reduce national rules is not preserved and training requirements for drivers are set according to national rules thus creating an evolution of the framework going opposite of the policy goal to reduce national rules at the benefit of interoperability.	

Railway system assessment

The following table provides a quick overview of the impact of the options in key aspects for rail safety and interoperability.

	<i>Option 0 (baseline)</i>	<i>Option 1</i>
<i>Safety</i>	Very high	Very high
<i>Interoperability</i>	Very high	Very low
<i>Market access</i>	Very high	Very low

<i>Competitiveness</i>	Very high	Very low
<i>Effectiveness</i>	Very high	Rather low

Coherency assessment

The EU legal framework is heavily impacted by the national rule under assessment.

	<i>Option 0 (baseline)</i>	<i>Option 1</i>
<i>Coherence</i>	Very high	Very low

5. Comparison of options and preferred option

4.10. 5.1. Comparison of options

Below a quick comparison of the options with impact on the key stakeholders as noted in 4. above is provided.

	<i>Option 0 (baseline)</i>				<i>Option 1</i>			
<i>Stakeholder impact</i>	RU	IM	TM	MS	RU	IM	TM	MS
<i>Effectiveness</i>	Very high				Rather low			
<i>Coherence</i>	Very high				Very low			

Colour legend

Very low/neg.	Rather low/neg.	Neutral	Rather high/pos.	Very high/pos.
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4.11. 5.2. Preferred option

Option 0 is the preferred option and it is recommended to issue a negative Agency opinion with regards to the draft national rule by Lithuania under assessment. Interoperability, market access and coherence of the EU legal framework across the Union risk to be weakened by a national rule that aims to regulate training of drivers by imposing risks assessments and methods. The goal of preserving safety is already ensured by the current EU legal framework and by the Safety Management Systems of rail operators. Appropriate enforcement of EU rules in place and effective oversight by competent authorities is to be considered as way forward within Option 0. The national rule in subject would duplicate EU requirements

already existing and create unnecessary burden on stakeholders with doubtful benefit. Interoperability for operations within and to/from Lithuania risks to be affected.

4.12. 5.3. Risk assessment

This light impact assessment is not based on primary or secondary data but on expert opinion and evidence submitted by the Lithuanian authorities. The risk variables are therefore low risk for all options.

Risk variables	Option 0	Option 1
IA Inputs	Low risk	Low risk
IA Outcomes	Low risk	Low risk

6. Monitoring and evaluation

4.13. 6.1. Monitoring indicators

N/A

4.14. 6.2. Future evaluations

N/A

7. Sources and methodology

4.15. 7.1. Sources

Desk research	<input type="checkbox"/>	Interviews	<input type="checkbox"/>
ERA database	<input checked="" type="checkbox"/>	Meetings	<input type="checkbox"/>
External database	<input type="checkbox"/>	Survey	<input type="checkbox"/>

The only source is the Single Rule Database (SRD) where Lithuania notified its draft national rule and related justification according to Art. 27 of Regulation (EU) 2016/796. The Agency provided its first assessment also through the SRD.