

Review Package:	Industry Guidance – Common Principles for assessing and managing risk
Lead Reviewer:	Russell McMullan
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Review comments:	<p>Comments to Russell.mcmullan@cityrailink.govt.nz</p> <p>Commenced October 2023</p> <p>09 May 2024 (first round)</p> <p>29 June 2024 (second round)</p> <p>11 July 2024 (third round and final editing)</p> <p>Submitted to NRIAF 15 July 2024 for endorsement / adoption on 15 August 2024.</p> <p>Some minor comments received on 14th August 2024 provide in the table below.</p>

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Please enter only one comment per row and enter your full name – date against your comment. Please add more rows at bottom if necessary.

Categories of comments

1 – suggestion

2 – important

3 – critical

Item	Title / doc ref / rev / page no. / section	Reviewers' comments	Comment Category	Author response	Open / Closed (date)
	Example: Whole document	Example Please use a different font, like Calibri. [Russell McMullan – 09 April 2024]	3	Example	Closed
1.	Page 7	The word extend should be removed from the first sentence [Ross Feutz – 2/5/24]	1	Word removed RM – June 2024	Closed

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2.	Page 7 – Principle 2	<p>I wonder whether it's worth bringing awareness to a few scenarios where risk assessments are required, but with different methods. For example, last year we had a "rail risk assessment" for our Edendale site which was a hazard identification and risk assessment model which encompassed the entire siding. This year we are using a different risk assessment method specifically targeted at the design/type of buffer stops that could be implemented in certain locations. We could provide some generic examples of the type of risk assessments that are available in the industry.</p> <p>[Ross Feutz – 2/5/24]</p>	1	<p>General feeling that it should be up to the organisation to determine how best to do this.</p> <p>Update to say the rationale for the method should be articulated (refer SFAIRP guidance).</p> <p>Words added:</p> <p>"and the rationale for their selection should be appropriately documented."</p> <p>"Document the choice of methodology: Clearly document the rationale for selecting specific risk assessment methodologies, including the criteria and considerations that informed the choice."</p> <p>RM – June 2024</p>	
3.	Page 8 – Approval mechanisms	<p>We could mention the value of key control inspections in this paragraph and the role that assurance plays in ensuring that PCBU's are in control. For example, we may have a barrier arm at a level crossing, but what inspection/maintenance strategies are in place to ensure that the barrier arm will work when called upon over its useful life?</p> <p>[Ross Feutz – 2/5/24]</p>	1	<p>Add a short para to articulate that the agreed control should then be implemented – (and periodically inspected)</p> <p>Added:</p> <ul style="list-style-type: none"> • "Inspection of Safety Controls: Implement inspections and audits of selected safety controls to ensure that they are effectively implemented and maintained over time. This verifies that decisions are translated into practice and that controls remain functional and effective in managing the identified risks. <p>"</p> <p>RM – June 2024</p>	

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4.	Page 10 - Qualifications	<p>As a suggestion, could we define the type of qualification that could be useful (not mandatory) for a rail risk assessment? A generic example used in engineering is a "Bachelors degree with honours". Is there an equivalent for rail risk management? [Ross Feutz – 2/5/24]</p>	11	<p>Broad consensus is that it is up to the duty holder.</p> <p>Add a comment that it's up to the PCBU / participant to determine what is competent.</p> <p>There is general consensus within the NRIAF that there is no one size fits all. We also note that most bachelors degrees do not cover safety risk assessments and methodologies as part of their syllabus. And only specific specialist post-grad cover this, where many gain their skills through experience and short courses.</p> <p>Added: "Determining Appropriate Skills and Expertise: Duty holders must identify and ensure that individuals undertaking safety risk assessments possess the necessary skills and expertise. This includes being satisfied with their professional qualifications, practical experience, and any specialised training in rail safety and safety risk management to ensure the integrity and effectiveness of the risk management process".</p> <p>RM – June 2024</p>	
5.	Page 8 – Methods and models	<p>Consider adding previous incidents, near miss and hazard reports in the review point. (Greg Hackett 7.5.23)</p>	1	<p>Will do. Note that the section is on practices and revisiting of methods.</p> <p>Added 'previous incidents' to the last bullet point.</p> <p>RM – June 2024</p>	
6.	Page 12 – Legal Obligations	<p>While the section discusses the requirement for SFAIRP to ensure legal requirements are met. As a suggestion, consider adding that there may be a requirement to complete a SFAIRP statement to compliment and justify the selected controls in the risk assessment (Greg Hackett 7.5.23)</p>	1	<p>Yes, that is a good idea. Will include.</p> <p>Added: "SFAIRP Statements: There may be a requirement to complete a "So Far As Is Reasonably Practicable" (SFAIRP) statement justify the selected controls in the safety risk assessment. This ensures that all identified safety risks are managed to a level that is reasonably practicable, providing a thorough justification for the control measures that are not implemented, as well as those that are implemented."</p> <p>RM – June 2024</p>	

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7.		<p>My only comment is do we have to use the term <u>residual risk</u> in content as it is not in law and has forever been confusing, the test is SFAIRP and residual leaves open to interpretation of acceptance or tolerance levels that are subject to a multitude of interpretations.</p> <p>[Darren Robin 15 June 2024]</p>	1	<p>Have replaced with “• Structured Communication: Establish a method for reporting safety risk assessments to upper management, focusing on risks with high consequences. This should involve a detailed presentation of the risk, its potential impact, proposed controls, those controls that were not selected, and the risk that still remains after implementing all reasonably practicable control measures (SFAIRP)..”</p> <p>RM – June 2024</p>	
8.	Para 5	<p>“From time to time” = extra words not required.</p> <p>[Ivor Smith 19/5/24]</p>	1	<p>Implemented</p> <p>RM – June 2024</p>	
9.	Principle 3 – due diligence	<p>"should" rather than "must"? This is a guidance document.</p> <p>[Ivor Smith 19/5/24]</p>	1	<p>Yes – fixed.</p> <p>RM – June 2024</p>	
10.	Principle 7 – shared language	<p>Do we want to develop a glossary? There is already a Glossary in the Shield app (the rules transformation programme) which covers common terms and that app should be available to rail participants. Anything specific to a document should be defined in the document.</p> <p>[Ivor Smith 19/5/24]</p>	1	<p>Glossary – park this – it seem to be another workstream.</p> <p>Note: NRSS1 has terms. (shield app - rules transformation programme has some definitions).</p> <p>RM – June 2024</p>	
11.	Principle 7 – shared language (Training and awareness)	<p>I'm not sure a training program to read a glossary is required?</p> <p>[Ivor Smith 19/5/24]</p>	1	<p>Agree – will remove these words. Removed, and edited page 13 to reflect the suggested changes.</p> <p>RM – June 2024</p>	

12.	Principle 3	<p>High consequence / risk vs high consequence. Needs a tidy up Ivor smith (21 May 24)</p> <p>Update 31 May 2024. Principle 3 draft text is below (track changes version available):</p> <p>Aim: To implement a rigorous review and approval process that ensures high-consequence safety risks are communicated to and evaluated by upper management and Officers of the Person Conducting a Business or Undertaking (PCBU). This is designed to ensure duty holders and officers have the opportunity to gain an understanding of high-consequence risks and the effectiveness of their mitigation strategies, allowing for informed decision-making.</p> <p>Considerations:</p> <ul style="list-style-type: none"> • Structured Communication: Establish a method for reporting safety risk assessments to upper management, including not only significant risks but also risks with high consequences such as death or life changing injuries even if they are low likelihood. This should involve a detailed presentation of the risk, its potential impact, proposed controls, and the residual risk post-mitigation. • Escalation Procedures: Define clear procedures for escalating safety risks with high consequences directly to PCBU Officers. This ensures that top-level management is aware of significant risks and can engage in the due diligence process. • Due Diligence by Officers: PCBU Officers should ensure they have a thorough understanding of high-consequence risks and their proposed mitigation measures. This includes an assessment of the controls' suitability, sufficiency, and sustainability, as well as their potential impact on safety. • Approval Mechanisms: Formalise an approval mechanism for safety controls associated with high-consequence risks. This ensures that risk mitigation measures undergo a thorough review and are endorsed at an appropriate level before implementation. • Documentation and Accountability: Maintain detailed records of all communications, decisions, and 	1	<p>This paragraph has been updated.</p> <p>“9. PRINCIPLE 3: Review, Escalation, and Due Diligence Safety risk management and safety risk assessments necessitate a structured approach for the communication and escalation of risks to upper management and duty holders, ensuring that risks identified as having high consequences, regardless of their likelihood, are appropriately communicated. This allows Officers and Duty Holders to conduct their due diligence on the availability and suitability of identified safety controls. Aim: To implement a rigorous review and approval process that ensures significant safety risks are communicated to and evaluated by upper management and Officers of the Person Conducting a Business or Undertaking (PCBU). This is designed to ensure duty holders and officers have the opportunity to gain an understanding of high-consequence risks and the effectiveness of their mitigation strategies, allowing for informed decision-making. Considerations:</p> <ul style="list-style-type: none"> • Structured Communication: Establish a method for reporting safety risk assessments to upper management, focusing on risks with high consequences. This should involve a detailed presentation of the risk, its potential impact, proposed controls, those controls that were not selected, and the risk that still remains after implementing all reasonably practicable control measures (SFAIRP). • Escalation Procedures: Define clear procedures for escalating safety risks with catastrophic consequences to Officers. This ensures that top-level management is aware of high-consequence risks so they can engage in the due diligence process. • Due Diligence by Officers: Officers of the PCBU should undertake a thorough evaluation of high consequence risks to health and safety, including assessment of the selected control measures and the rationale for the controls that were not selected. • Approval Mechanisms: Formalise an approval mechanism for safety controls associated with high-consequence risks. This ensures the selection and application of safety control measures are documented . • Inspection of Safety Controls: Implement an inspection regime for the selected safety controls to ensure that they are effectively implemented and maintained over time. This verifies that decisions are translated into practice and that controls remain functional and effective in managing the identified safety risks. 	
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		<p>approvals related to the review and approval process. This supports accountability, transparency, and continuous improvement in risk management practices.</p> <p>Example: In response to a safety risk assessment that revealed a high-consequence risk associated with a new rail construction project near a residential area, the process of escalation to PCBU Officers is initiated. A detailed report outlining the risk, proposed mitigation measures, and an analysis of residual risk is prepared and presented to the Officers. They engage in a due diligence process, examining the proposed controls' alignment with best practice and legislative requirements, the potential impact on community safety, and the measures' sustainability over the project's lifespan. Following a comprehensive review, the Officers provide feedback, suggesting enhancements to the communication plan with the community and requesting additional emergency response preparedness measures. The approval of the risk mitigation measures, contingent on these enhancements, ensures that the project proceeds with a robust safety framework, directly overseen by the highest levels of management.</p>		<ul style="list-style-type: none"> Documentation: Maintain records of, decisions, and approvals related to the approval process. Documenting "what you knew at the time" when making safety-related decisions provides additional legal protection by showing you acted with appropriate level of due diligence with the knowledge at hand. . <p>Example: In response to a safety risk assessment that revealed a catastrophic risk associated with a new rail construction project near a residential area, the process of escalation to PCBU Officers is initiated. A detailed report is prepared and presented to the Officers that outlines the risk, proposed mitigation measures, and the safety risks that remain after implementing all reasonably practicable control measures. They engage in a due diligence process, examining the proposed controls' alignment with best practice and legislative requirements, the potential impact on community safety, and the measures' sustainability over the project's lifespan. Following a comprehensive review, the Officers provide feedback, suggesting enhancements to the communication plan with the community and requesting additional emergency response preparedness measures. The approval of the risk mitigation measures, contingent on these enhancements, ensures that the project proceeds with a robust safety framework, directly overseen by the highest levels of management."</p> <p>RM – June 2024</p>	

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13.		<ul style="list-style-type: none"> • Scope: Provide clarity to the reader what risks the document is referring to i.e. effects of climate change. Provide clarity on what parts of the rail system are included and any exclusions. • Edward 		<p>Added this to the footnote on page 2 to assist in the definition of “railway activities” :</p> <p>“Para 4 (2) of the Railways Act (2005) defines railway activities to include a range of responsibilities and operations, including the ownership of railway infrastructure by infrastructure owners, the ownership and management of rail vehicles by rail vehicle owners, and the ownership and maintenance of railway premises by railway premises owners. It also includes the operation and maintenance of railway infrastructure by access providers, the operation and maintenance of rail vehicles by rail operators, and the maintenance of railway infrastructure, rail vehicles, or railway premises by maintenance providers. Additionally, the management and operation of railway premises by railway premises managers, the authorisation of rail vehicles occupying or moving on a railway line by network controllers, and any activities prescribed by the railway regulations.”</p> <p>RM – June 2024</p>	
14.		<p>Being specific what the document is trying to achieve i.e. legal requirements of S7 Railways Act. The MCA objectives could be included as objectives.</p> <p>Edward</p>		<p>Added: “including the general safety duties specified in Section 7” to Para 1.</p> <p>RM – June 2024</p>	
15.		<ul style="list-style-type: none"> • Context: Not sure if this is appropriate in a guidance document, however more context of why, what, how and implementation of the guidance created, would provide clarity to the reader. <p>Edward</p>		<p>I went back and looked at the reason why we created this guidance document and identified that we missed one important principle: SFAIRP as the basis for safety risk decisions. I have added a section (new principle 2.)</p> <p>RM – June 2024</p>	

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16.		<ul style="list-style-type: none"> How are non-rail participants, who have a stake in this work and may rely on it in the future, are identified i.e. relationship with NZTA, Waka Kotahi. May help understanding its use and implementation. How does it fit within the rail operating model. We did some work on the rail operating model in NZ and its complex with many moving parts, it might be worth considering it during the review. <p>Edward</p>		<p>RM to explore:</p> <p>Added the following to principle 5: “Additionally, identify and engage relevant non-rail participants who have a stake in railway safety, such as road controlling authorities, adjacent property owners, industry groups, unions, emergency services, regulatory bodies, and public interest groups.”</p> <p>RM – June 2024</p>	
17.	Page 9 – Principle 3 Review, Escalation, and Due Diligence	<p>Consider adding a paragraph on risk assessment review. E.g. periodic review to ensure validity, following injury, illness or environmental harm, when changes is proposed etc.</p> <p>Ludwig</p>		<p>Added :</p> <p>“Review: Conduct regular reviews of safety risk assessments to ensure they remain valid and effective. These reviews should be scheduled to be conducted periodically (e.g., annually or bi-annually), following any incident of injury, illness, or environmental harm, when significant changes in operations or processes occur, and when new information about hazards or control measures becomes available. This practice helps to continuously update and improve risk management strategies, ensuring the ongoing safety of workers, passengers, and the public.”</p> <p>RM – June 2024</p>	
18.	Principle 8 – Agreements and Accountabilities And Principle 9 – Conflict Resolution	<p>It seems like these sections describes safety management in general, and no longer focussing specifically on risk management. E.g. should it be worded to describe agreements and accountabilities regarding risk assessment, shared / overlapping risk, risk management activities etc?</p> <p>Ludwig</p>		<p>both sections updated to try to address these comments, with a specific focus on interfacing participants. Hopefully that addresses the comment.</p> <p>RM – June 2024</p>	

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19.	Principle 8 – Agreements and Accountabilities And Principle 9 – Conflict Resolution	Complexity of risks have grown in the metro operating environment and for a strategic approach do we need to highlight considering risks as part of the rail system. Gareth 04/06/2024		I have added this to the 'context and understanding' of principle 1 : "Complexity of Metro Areas: Recognise and address the unique complexities and risks associated with metro operating environments, ensuring that risk assessments consider the dense, dynamic, and interconnected nature of urban rail systems." RM – June 2024	
20.		Do we need to add a section for new rail licence holders for the NRS? Gareth 04/06/2024		Adding a section for new rail licence holders for the NRS should probably be a stand alone separate, dedicated document. RM – June 2024	
21.		Do we need to include risk communication for the NRS. Gareth 04/06/2024		Agreements and accountability section has been renamed to "Interfacing Participants" and more emphasis has been put on communication between interfacing participants. RM – June 2024	
22.	New comments after 11 June 2024 below this line please				

<p>23.</p>	<p>Hazard Log</p>	<p>The document provides principles for assessing and managing safety risks within New Zealand's railway sector. However, it is silent on how these risks are documented and more importantly communicated.</p> <p>The document would benefit from a principle about the beneficial use of hazard logs as the basis for PCBUs individual, or collective recording and communicating their interpretation of hazard and risk decisions, controls, and assumptions about interfacing parties. I understand a hazard log is a common way rail participants ensure a systematic and transparent approach to tracking identified hazards, documenting decisions, and maintaining a clear record of controls and assumptions.</p> <p>In this case, the principle should include the focus on how the most serious forms of harm (permanent impairment, fatality or offsite/community harm are controlled). This focus requires a cross functional effort and should avoid an overly assumptive view that only using an occupational health and safety lens can adequately solve complex socio-technical-political systems.</p> <p>This is more than pencil whipping a hazard log. This approach should enhance communication and accountability among all stakeholders, supports effective monitoring and review processes, and aligns with good practices in safety management. Philosophically, this also addresses the only ever half-truths we each have about what might be importantly wrong. It helps treat complexity without oversimplifying given it requires group decision making, and it also gives a voice to topics that represent the affected but uninvolved in decision-making.</p> <p>A template such as that that in the Engineering New Zealand guideline could be provided as a separate document to the guidance. https://d2rjvl4n5h2b61.cloudfront.net/media/documents/PN04_HealthSafety_by_Design.pdf</p> <p>Chuck Norris 12/06/24</p>		<p>I've added a new principle 3:</p> <p>“PRINCIPLE 3: Hazard Log / Register is the Basis for Safety Risk Management Safety risk management should utilise a railway hazard log as the foundational tool for recording and communicating safety risk decisions, controls, assumptions, and as well as the assumptions about controls provided by interfacing parties. This principle ensures a structured, transparent, and consistent approach to managing and communicating safety risks within the rail participant’s organisation and between interfacing parties.</p> <p>Aim: The aim of this principle is to promote the use of a consistent approach for managing identified hazards, documenting decisions, assumptions, maintaining a clear record of selected and rejected controls, and sharing information between participants. This approach aims to enhance communication, shared accountability at interfaces, and promote continuous improvement in safety risk management.”</p> <p>Etc.</p> <p>RF provided some examples of a template. Plus, the engineering NZ one is specific to SiD which has some good points. I'll look to adapt those.</p> <p>RM – June 2024</p>	
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24.		<p>Principle 3: The term “hazard log” is not a common name for SHE risk assessment document.</p> <p>Also conscious that “risk assessment” is the process and not necessarily the name of the document, most people refer to it as the risk assessment, or even risk register.</p> <p>All these definitions are non-standardised and used haphazardly. Consider including hazard log in the glossary, or using another term (consult with the group) Ludwig 18/06/2024</p>		<p>Hazard Log / Hazard Register / Safety Risk Register (name):</p> <ul style="list-style-type: none"> • I have changed the first para to state “railway hazard / hazard register / safety risk register)” and included the term in the definitions. • I acknowledge that hazard log is not a common name in the health and safety risk assessments (OSH domain), • However it is a common name for operational railway safety risk management (Rail Ops). <p>Risk assessment (process vs document):</p> <ul style="list-style-type: none"> • Agree, a risk assessment is the process, though as you note you can also have a risk assessment “document” (i.e. here is my risk assessment”). • I’ve reviewed the use of the terms through the document and clarified as ‘risk assessment process’ or ‘documented risk assessment’. • Definition added (from the dictionary) “a systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking.” <p>RM – June 2024</p>	

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25.		<p>Principle 7: Experience and Qualifications</p> <p>The opening statement of this principle is about personnel <u>leading</u> safety risk assessments. However the rest of this section refers to anyone undertaking or carrying out, or those involved in risk assessment. The intent of this section is unclear. Can there be better distinction between those leading and responsible for risk assessment, and those participating or involved in risk assessment? Involvement needs to be across multiple competencies and experience, and leading needs to have specific risk assessment experience and competency.</p> <p>Ludwig 18/06/2024</p>		<p>(to review & clarify</p> <p>The intended focus was on the person leading, However, it's on the person leading that they have the right people in the room / participating.</p> <p>This document will leave it up to the organisation as this is about the application of safety, allocation of money and resources, and gets tested in court. RM – June 2024</p> <p>Align to the SFAIRP guidance. RM – June 2024</p>	
26.	Page 8	<p>The RMTU has contractual agreement with the rail companies that require union consultation regarding health and safety matters. Add the word unions to the legal considerations. <i>“Recognise contractual agreements and obligations between rail participants and other stakeholders, including infrastructure providers, service providers, unions and regulatory bodies, which may impact safety responsibilities and risk management practices”.</i> Karen 18 June 2024</p>		<p>Added RM – June 2024</p>	
27.	Page 9, page 11	<p>Add the words ‘and their union representatives’ Karen 18 June 2024</p>		<p>Added RM – June 2024</p>	
28.	Page 14	<p>Add the words " including workers and their representatives"</p> <p>It's Important that there is consultation and engagement about the risk assessment tool, particularly the risk tolerance level needs to be agreed. A good example is the use of FAID for predicting fatigue risk. I can elaborate if needed. June 18, 2024 at 12:01 PM Karen 18 June 2024</p>		<p>Note: Engage workers on the methodology and the establishment of parameters within the methodology. RM – June 2024</p>	

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29.	Principle 6 (page 18)	<p>Suggest a revised example for principle 6:</p> <p>“Workers from two different PCBU’s in Wellington were concerned about the risk of collision whilst shunting across a public level crossing. The workers documented the number of near misses with road vehicles whilst shunting across the level crossing and asked their union to write to the respective PCBU’s and other Stakeholder including the Regional Council and Regulators to outline their concerns. The PCBU’s and the worker representatives agreed to interim solution of a different shunting arrangement to minimise the safety risks until the permanent solution identified in their combined PCBU risk assessment is achieved.”</p> <p>Karen 18 June 2024</p>		<p>The suggested example is used instead.</p> <p>RM RM – June 2024</p>	
30.	Page 2 - Objective	<p>General readability suggestion.</p> <p>Para 1 says “...objective of this framework is to establish...”. The document title calls them Principles and para 2 calls this a guidance document. Suggest ‘guidance is a good term.</p> <p>Ivor 18 June 2024</p>	1	<p>Incorporated</p> <p>RM – June 2024</p>	
31.	Page 5 – legal obligations	<p>General readability suggestion.</p> <p>Add ‘ing’ to the words from bullet 3 (Consider) onwards to align with preceding “Key obligations include:”</p> <p>Ivor 18 June 2024</p>	1	<p>Incorporated</p> <p>RM – June 2024</p>	
32.	Page 11 - Documentation	<p>General readability suggestion.</p> <p>Spurious comma? “Maintain records of, decisions, and approvals related to...”</p> <p>Ivor 18 June 2024</p>	1	<p>Incorporated</p> <p>RM – June 2024</p>	
33.	Page 12 – effective communication bullet	<p>General readability suggestion.</p> <p>Delete “that”.two-way communication to that enable stakeholders....</p> <p>Ivor 18 June 2024</p>	1	<p>Incorporated</p> <p>RM – June 2024</p>	

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34.	Page 15 – Principle 9 Interfacing Participants	Consider another bullet point: Clarity of interfacing risks. Where one rail participant creates a risk which has the potential to impact other rail participants, the participants must cooperate to eliminate or minimise the risk to the extent they have influence and control of the risk, or the delivery of the control measure(s). Ivor 18 June 2024	1	Incorporated RM – June 2024	
			All changes incorporated		
		Closed		Closed	

END – 11 July 2024

The following comments were received on 14 August, after issue and the night before NRIAF ratification on 15 August. They do not result in any amendments to the document and were provided back to the participant out of courtesy:

	Title / doc ref / rev / page no. / section	Reviewers' comments	Comment Category	Author response	Open / Closed (date)
	6b	6 b) avoid any actions ? Could be reworded	1	For context 6 b) states “[key obligations include] Individuals employed by rail operators avoid any actions or inaction concerning rail vehicles, infrastructure, or premises could lead to death or serious harm” This wording is a rephrasing of the Railways Act Part 2, Para 7 (2) that states “No rail personnel of a rail participant may do or omit to do anything in respect of a rail vehicle, railway infrastructure, or railway premises....” The re-phrasing was an attempt to make it clear that a participant and its people are responsible for both “actions and inaction” that can lead to death and serious harm. We can consider this for rephrasing in any next revision, or may just provide verbal explanation to those who are unsure of its meaning.	Closed
	6d	6 d) Consider getting ISO 14001 certification - gives assurance that we are working in harmony with the environment.	1	The adoption of standards was explored in the 30 Jan 2024 workshop, where a range of standards were considered across the entire document. The group were reluctant to require specific certifications because it would be burdensome to very small rail operators. Any mention of standards is provided as pointer toward more information for participants. The group was careful to make sure the document does not limit how organisations might address the environmental protection under the Act’s requirement to protect property and equipment, and so participants are free to use whichever approach they choose.	Closed

10	10, example) Using the several methodologies approach might be confusing, and might not allow you too identify future processes that might be affected. ideally you would follow a change management process prior to completing the risk assessment. Furthermore how would you identify several methodologies in a process that it supposed to be followed.	1	<p>The phrase is an example of a participant undertaking a risk assessment. The example states “a railway participant evaluates several risk assessment methodologies before selecting a combination approach”. This is an example, and this does not state or require that one must use any specific or combination of approaches. The example scenario draws on the NRIAF SFAIRP guidance on the NRIAF site issued previously, and the methodologies available for undertaking risk assessments outline din Peace 2015 (referenced). The group discussed methodologies at length, and concluded that it is not uncommon in some examples to use a mixture of methods to gain an understanding of risks (i.e. HAZOP, then workshops). Principle 4 guides participants to use ‘recognised methods that are contextually relevant’ to avoid the misapplication of project or financial risk management techniques for safety risk management for example. If a participant is unsure about which method is appropriate for which context, they might consider growing their expertise in this area. The NRIAF has an initiative/priority to establish a safety risk management practice forum to assist with this (see the NRIAF priorities)/</p>	Closed
16c	16 c) Clarification needed here - Will this be communicated within the said organisation or generally to all rail participants?	1	<p>16c relates to Interfacing Participants, where the consideration requests participants “establish processes for monitoring and reporting on safety responsibilities, including shared interfacing risks. This includes communicating the results of safety audits, inspections, and reviews, with findings reported to the relevant levels of management and stakeholders.”</p> <p>This is guiding participants toward communicating the results of their safety risk management audits, inspections, and reviews, to interfacing participants who have a stake in the risk. For example, Train Control might share audit findings on train controller competency with the railway operators they control, as part of interfacing risk management. Ultimately it is up to the rail participant to determine what those shared risks are, and what might be shared more broadly than that. We recognise such an approach would be a big step for the industry, though we also note that there are legal obligations within the Health and Safety at Work Act that related to shared risk management (Refer to the CCC obligations). That said, we don’t believe the statement requires further clarification within the document at this time.</p>	Closed

	17 e	17. e) Again, (if in a shared participant scenario) this could invoke further disagreements as their will be 3 sides to the truth. Furthermore who will manage such sharing lessons and what guarantee will all parties have that they will be impartial (except for their word).	1	Principle 11 relates to conflict resolution. The consideration relates to a participant learning from previous disagreements with other participants. To answer your question, 'who will manage such sharing of lessons?', This is up to the participant. The participant might share these lessons learned internally with management (i.e. "this was successful in resolving this conflict, this was not successful" or the participant might meet with their interfacing participants and say "hey, we disagreed on some things, and we found it tough, but one thing that worked for both of us was xyz, so perhaps lets try with that at a starting point when we disagree next time" – and minute this interaction so there are some shared guidelines about how you engage. The New Zealand Rail environment is co-regulatory which demands we work together as an industry. The NRIAF recognised from the very beginning that conflict resolution is something that all parties need to work on, hence why learning from previous experience it is suggested as a principle.	Closed

END 15 August 2024