

Closing date 21 January 2022

1. Chris Duddy, Avanti West Coast (Independent view)
2. James Taylor, Balfour Beatty
3. Brian Haddock Network Rail
4. Clive Collins, Chiltern Railway
5. Stewart Player, South Western railway
6. Gilbert Rowe, L D Associates Ltd
7. Justin Willett, GTRailway
8. Roger Lewis. The University of Sheffield
9. Gary Portsmouth, RSSB

Summary of comments submitted	Number	Comment categorisation key
Consulted	298	
Critical errors		CE
Editorial errors		ED
Typographical errors		TY
Observations		OB
Total returned	9	
Classification codes (CC)		
Document change		DC
No change		NC
Date responses published:		

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1	4	1.1.2	Part b) suggests that a collision is solely down to loss of train detection and through the non-operation of track circuits. Whilst this may be true a collision can also be caused by the inability for a train to slide to stop prior to a conflict point.	Collision due to the loss of train detection through the non-operation of track circuits and/or the inability to bring the train to a stand short of conflict point due to wheelslide; and	1	1.1.2 b)	OB	DC	Reworded as suggested.
2	4	1.1.2	This section fails to include collision in (a) and fails to mention potential staff and passenger injuries and fatalities. Additionally, it is suggested that it	Amend as shown below a) Trains running too far or too fast - potentially leading to a movement authority being exceeded (signals passed at danger, SPaD), an intended stopping place being overrun, collision with another	6	1.1.2, b) 1.1.3	OB	DC	New bullet b) added to include collision with another train or infrastructure. New clause 1.1.3 now mentions injury or fatality and potential consequences.

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			should make reference to the possible consequences of having a serious incident as a result of a leaf fall issue.	train or infrastructure or derailment; potential staff and passenger injuries and fatalities. b) Collision due to the loss of train detection through the non-operation of track circuits; potential staff and passenger injuries and fatalities; Add new (d) as follows d) Reputational damage; costs incurred during post incident investigations (internal and external); costs incurred in repairing/replacing damaged assets.					
3	4	1.1.2	Is financial loss a hazard? I would suggest that damage to rails or wheels is a hazard because it might cause a rail-break or other component failure, but I would suggest that financial impact is a consequence, not a safety hazard.	Reword Sub clause c to refer to the safety implications of damage to wheels and rails, such as railburns or the hammer-blow caused by wheel flats. If there is a desire to highlight the financial impact I would suggest that the main clause resumes after c and states that all three of the hazards have a significant impact on delivering the timetable, staff resource and reputation, all of which are costly.	4	1.1.2 d)	OB	DC	New clause 1.1.3 added referencing impacts of low adhesion.
4	4	1.1.2	Are there any other hazards that could be exposed to but are less obvious that are worth including?	Include	7	1.1.2	OB	NC	Noted. The clause lists many of the common hazards to highlight the impact of low adhesion on the industry.

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			E.g. is there electrical risk if the trains bonded axel is not making sufficient contact with the running (return current) rail?						
5	4	1.1.2.(a)	No mention of collision under (a), as the reference to collisions in (b) is particular to WSTCF – not slides or SPADs	Add 'collision' after ..'..overrun, derailment or 'collision'.	3	1.1.2 a)	OB	DC	Reworded to include collision.
6	4	1.1.3	By implication (see Part 2), the infrastructure operator is responsible for/has ownership of the site-specific plans but the people most exposed to leaf fall safety risks are the Train Operators and Train Passengers. Are the potential risks and consequences to Train Operators and Train Passengers adequately covered from their perspective?	Suggest it would be worth adding – in Part 1 - a section to highlight the potentially very high "Operational Risks" – e.g. collisions and derailments with potential loss of life – which can occur during a leaf fall season? Suggest adding a new 1.1.3 (see below)and re-number the existing 1.1.3 as 1.1.4. 1.1.3 "The majority of leaf fall events result in delays and journey time extensions which adversely affect passenger journeys and the punctuality of the railway service. However there are the occasions on which multiple factors combine to produce very severe conditions which can result in exceptionally low adhesion and cause significantly extended braking distances. When	6	1.1.3	OB	DC	Reworded to include mention of injury or fatality and potential consequences. New clause 1.1.3 added referencing impacts. Other of the suggestions are already included in 1.1.4.

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				these circumstances occur, there is the potential for a very serious incident – train collision and/or derailment – in which passenger and staff injuries and fatalities may result. High risk sites are those at which such events are most likely to occur and at which the consequences will be most severe. The aim of this Standard is to ensure appropriate measures are taken by all organisations to minimise the risk of an incident in which any injuries are sustained.”					
7	6	1.3.1	This section could be improved to make it explicitly clear that a prime responsibility is to ensure the health and safety of staff and passengers on trains which are operating during the leaf fall season	Suggest amending the existing text as follows “Users of documents published by RSSB are reminded of the need to consider their own responsibilities to ensure health and safety at work and their own duties under health and safety legislation. It is essential to ensure the Health and Safety of all passengers, staff, contractors, and general public during operation of the railway during the leaf fall season. RSSB does not warrant that compliance with all or any documents published by RSSB is sufficient in itself to ensure	6		OB	NC	This section uses the same words in all RSSB Rail Industry Standards and cannot be changed specifically for RIS-8040-TOM. However, RSSB will take this feedback for future revisions of the wording of ‘Health and safety responsibilities’.

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				safe systems of work or operation or to satisfy such responsibilities or duties.					
8	7	2.1.1	Should include the need for effective and ongoing collaboration and co-operation. Sectional appendix is a main line term but may be less appropriate to other operators who may wish to benefit from this Standard. Should the requirement be extended to include the need to publish the details of the site specific plans?	Amend existing text as follows “Infrastructure managers, in collaboration with relevant parties, shall: a) Identify sites of high-risk where low adhesion between the wheel and rail may occur; and b) Publish the details of high-risk sites in the sectional appendix or equivalent document. c) Publish the details of the agreed mitigation plans.	6	2.1.1 2.2.1 c) G2.2.13	OB	DC	This clause has been reworded in 2.2.1 c) to share plans and guidance added in G2.2.13 on good practice to decide how to store these.
9	7	2.1.1 2.3.1	2.1.1 already requires the IM to identify high-risk sites, therefore we could delete 2.1.2 However, there is an impact of 2.3.1 a) where we will need to amend the wording	Amend 2.3.1 a) When the level of available adhesion has been reported as being worse than would be expected (by the driver) for the location and environmental conditions.	9	NA 2.3.1	OB	DC	Clause deleted as suggested. Bullet amended as suggested.
10	7	G 2.1.6 g)	Amend G2.1.6 g) to say:	g) Feedback from traincrew, including reports of rail adhesion levels deteriorating to a level that is worse than would be expected (by the driver) for the location and environmental conditions	9	G 2.1.5 a)	OB	DC	Bullet reworded as suggested and to include revision from comment 36.
11	10	G 2.3.5	G2.3.5 would benefit from being amended.	Amend G2.3.4 If rail adhesion levels have been reported as being worse than would be	9	2.3.3	OB	DC	This has been reworded as suggested and has been made a requirement following the suggestion of comment 31.

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				expected (by the driver) for the location and environmental conditions, it is good practice for the infrastructure manager to inform railway undertakings of the remedial action taken and to confirm its effectiveness.					
12	7	2.5.3 c)	G2.3.5 GERT8000-TW1, section 28 sets out the operating rules relating to the management of rail adhesion, including the action to be taken when rail adhesion levels deteriorate to a level that is worse than would be expected (by the driver) for the location and environmental conditions.	2.5.3 c) should be revised to say: c) After receiving reports of rail adhesion levels deteriorating to a level that is worse than would be expected (by the driver) for the location and environmental conditions	9	G2.5.3 b)	OB	DC	G2.5.3 reworded as suggested and to include revision suggested in comment 36.
13	7	2.1.2	By the time the rail adhesion has fallen to the current “reportable” definition, it may be too late to take effective action. This should include the requirement to implement additional mitigation measures (e.g. speed restrictions) as soon as practical	Amend the definition provided (see comment below) for “reportable rail adhesion level” Add an additional sub clause requiring taking appropriate action to be taken without delay if “reportable rail adhesion levels” are experienced.	6	2.1.1 2.3.2	OB	DC	Clause deleted as 2.1.1 already requires the infrastructure manager to identify site of high-risk. See comment 7. As a result, the term ‘reportable’ is no longer used in the document, however a full description is now used consistently throughout the document (such as in G 2.1.5 a). Requirement 2.3.2 now mentions implementing alternative mitigation measures without delay.
14	7	2.1.2	I think some words need to be added in here about how the site assessment will be undertaken.	Add some more detail about what constitutes a ‘site	5	N/A	OB	DC	This clause has been removed as 2.1.1 already requires the infrastructure manager to identify sites of high-risk. See comment 8. Guidance is clearer on how and when to

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			Currently the MOM undertaking the inspection is not allowed on the track unless they have a possession (no red zone working).	assessment' and what this should entail					assess sites G 2.1.5 when adhesion has been reported.
15	7	2.1.5	Sites which include a junction, and hence the potential for conflicting moves, should by default be considered a high-risk site unless proven otherwise.	Suggest the wording is amended as follows: "A 'high-risk' site is a location that (a) is likely to be affected by low adhesion or (b) includes a junction with conflicting move potential and which may be affected by low adhesion. Any such site shall require a site-specific plan."	6	A3.1d)	OB	DC	G 2.1.5. introduces the definition of a high-risk site, which is consistent with the 'Definition' section. Junctions are potential hazards, therefore they are now included into the list in A.3.1.
16	7	2.1.6	Suggest that the list should be expanded to include mitigation work/actions not carried out/implemented during previous season(s)	Add "Recommended vegetation work not undertaken" "Mitigation train paths not operated as timetabled (e.g. no crew, failed train, conflicting work preventing operation (e.g. track possessions))."	6	2.3.2	OB	DC	A requirement has been added where existing mitigation measures are identified as ineffective or unavailable such as the missed run of a rail head treatment train, alternative mitigation measures shall be implemented without delay. See also comment 13.
17	7	2.1.6	In examples of information to inform a site for low adhesion ROLAs were missed out as examples.	Add in Reports of Low Adhesion (ROLAs) to examples of how information regarding sites are identified.	3	G2.1.5 a)	OB	DC	Added suggested text to list in G2.1.5 a)
18	8	2.2.1	The development of site-specific plans should involve those organisations which operate services over those sites or are otherwise affected by those plans.	Suggest the wording is amended as follows: "Infrastructure managers shall lead the development of site-specific plans that set out measures to eliminate or mitigate the risks of low adhesion at high-risk sites. Infrastructure managers shall	6	2.2.1	OB	DC	Clause reworded to include suggested text.

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				ensure that the development of site-specific plans involves all organisations which operate services over those sites.”					
19	8	2.2.2	(Minor word changes) I would like to see the infrastructure manager be responsible for ensuring that railway undertakings review site specific plans. OTM undertakings tend to get forgotten. - It would be useful if this standard forced the I.M. to share this information on a common sharepoint system. (This would also address my comment below)		2	G2.2.9 G2.2.13	OB	DC	Clause 2.2.2 is a specific requirement for the railway undertaking to review the site-specific plans. 2.2.1 has been reworded as a result of comment 18 for the infrastructure manager to involve all relevant railway undertakings in the development of the site-specific plan. Each requirement is clearly aimed to each transport operator; however, a requirement cannot be aimed to the infrastructure manager to ensure the railway undertakings do their part. This topic area (2.2) has ‘Guidance for collaboration’ OTM have been added as relevant parties in G2.2.9 d). Guidance added relating to good practice to agree where plans are stored for easy access for all.
20	8	2.2.2	Railway undertakings need to include all of the following (it is suggested in this order of priority). - Operators/ operation of Leaf Fall Mitigation Trains - Operators/operation of passenger and freight trains Operators/operation of Track maintenance vehicles/trains	Expand 2.2.2 to include the following as mandatory consultees/reviewers - Operators of Leaf Fall Mitigation Trains on that route - Operators of passenger and freight trains on that route - Operators/operation of Track maintenance vehicles/trains on that route Those responsible for planning infrastructure works which could affect or prevent the	6	G2.2.9	OB	DC	The railway undertakings (as defined in the ‘Definitions’ section of the standard) are organisations that operate vehicles in ration with any infrastructure but excludes those that carry out maintenance work. G 2.2.9 has been amended to included ‘other relevant parties’. Guidance for G 2.2.9 gives more information on who those relevant parties are.

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				planned operation of leaf fall mitigation trains					
21	8	2.2.4	Suggest adding an additional clause regarding defining the relative priority of potentially conflicting activities during the leaf fall season. (e.g. it may be argued that the operation of the leaf fall mitigation trains should be given a very high priority, since failure to operate these trains may have a significant and wide-ranging adverse impact on the safe operation of the timetabled service.	Add sub clauses to the following effect f) Enables clear prioritisation between potentially conflicting activities during the leaf fall season. An example might be undertaking maintenance work (possession) which prevents the operation of a leaf fall mitigation train).	6	G2.2.4	OB	DC	Added as suggested in G2.2.4.
22	8	2.2.6	Increasing the frequency of control measures may not always reduce incidents, if this does not increase their effectiveness. Therefore review frequency and effectiveness to increase either would then result in an improvement. Examples have included change of speed during rail head treatment, use of different times for adhesion increasing products as well as rail cleaning etc	Change wording to 'increasing the effectiveness and reviewing frequency of existing control measures'	7	G2.2.6	OB	DC	Reworded to include suggested text.
23	8	2.2.6	It might be considered worthwhile to identify what capability the rolling stock has to improve the adhesion. Single fixed rate sanders, Dual fixed rate sanders, Single variable rate sanders and dual/distributed variable rate sanders will all deliver different levels of improvement. This may not be fully appreciated by all the users of this Standard.	Recommend that the site-specific plan includes information on the low adhesion capability of the rolling stock operating the services over that site	6	A.1.1 e)	OB	NC	This information is included in section A1.1 encouraging the inclusion of the availability of such information in site-specific plans.

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24	8	2.2.7	The implementation of additional measures should be primarily based on reducing the operational risks which can arise as a result of leaf fall contamination. The most serious consequences may be infrequent and require a combination of conditions to occur simultaneously, but it is those when the potential consequences are most severe.	As currently worded, the text in (b) almost discourages implementing additional measures. It states that there is a need to “Determine if they could introduce a risk of failure or damage to <list of items>” but fails to provide any further guidance as to what action should then be taken. A potential impact being identified should not necessarily preclude the implementation such a measure. It is suggested that the wording of G2.2.7 (b) is amended accordingly.	6	G2.2.7	OB	DC	Reworded as suggested in G2.2.7
25	9	2.2.9	B) How are new railway undertakings involved in the process?		2	N/A	OB	NC	New railway undertakings would be included in collaboration if they run services over a high-risk site as per guidance in G 2.2.9 as they may be a relevant party for a high-risk site.
26	9	2.2.9	Suggest that the Track Possession planning team are included since it would be preferable to avoid any possession which could impact on the operation of any leaf fall mitigation train during the Autumn season.	Amend G2.2.9 to include the “Engineering Possession Planning” team.	6	G2.2.10 g) G2.2.11 d)	OB	DC	Added to G2.2.10 list Railway maintenance also referenced in G2.2.11
27	9	2.2.11	Suggest that human factors be included in the list as perception of a site may be a factor in how drivers respond to a WSP incident.	Include human factors relevant to driving styles as a relevant item for understanding.	4	G2.2.11	OB	DC	Human factors added to G 2.2.11 e) Local knowledge tbc Reworded as suggested. G2.2.11 relates to individuals knowledge and

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			It is also suggested that local knowledge be added to the list as this will tally with appendix section A4.	Add local knowledge to list.					understanding to develop site-specific plans, it is inferred that as it is site-specific they will have local knowledge.
28	8-9	2.2/ 2.3	There is nothing within the requirements to consider autumn braking techniques. Where and how drivers brake can be a significant factor in determining some of the approach to rail adhesion. Driving instructions and policies are however in the appendix but not for consideration within the site plans. Is this a deliberate omission and if so why?	For example- include in G 2.2.10, within either c) or f) ..the autumn driving policies and instructions and how the trains are driven at this location?	7	G2.2.11 Of)	OB	DC	Reworded to include suggested text in G2.2.10 f)
29	10	2.3.2	The wording of this section makes no reference to avoiding safety incidents due to trains overrunning. It is suggested that this should be included.	Amend the wording of G2.3.2 to stress the need to minimise the risk of a safety incident.	6	G2.3.4	OB	DC	Added to G2.3.4 as the aim is to 'mitigate adverse events'.
30	10	2.3.3	It is suggested that this clause should be amended to become a requirement rather than a good practice guidance note.	Amend the wording to read "If an existing control measure has been identified to be ineffective/ not available, such as, missed run(s) of a rail head treatment train, then it is required alternative mitigation measures are implemented without delay so as to mitigate against the likelihood of reportable rail adhesion, extended braking distances with the potential for overruns and collisions/ derailments."	6	2.3.2	OB	DC	Added as a requirement.

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31	10	2.3.5	It is suggested that this clause should be amended to become a requirement rather than a good practice guidance note.	Amend the wording to read “If rail adhesion is reportable, including at locations that do not have a site-specific plan, it is good practice for the infrastructure manager to shall inform affected railway undertakings of the remedial action taken and subsequently advise on its effectiveness.”	6	2.3.3	OB	DC	Moved to a requirement and amended as suggested by this comment and comment 11.
32	10	2.4.1	The requirement in this clause is for the Infrastructure Manager to monitor the effectiveness of site-specific plans. What action is to be taken? Are the results to be reported? Is the Infrastructure Manager expected to take action independently?	Suggest Clause 2.4.1 is expanded to define what action is expected from the monitoring of site-specific plans.	6	2.5	OB	DC	Clause 2.4.1 is the requirement to monitor site-specific plans. The requirement to review what you have monitored is in the following topic 2.5 ‘Review and update site-specific plans’.
33	10	2.4.4	At present there is no consistency or clear instruction on how to examine wheelsets or capture the description – this is an area Chiltern is working on, but there is a need for a best-practice document on what to look out for, how many axles to check etc.	Add clause G2.4.5 – It is good practice for Infrastructure managers and railway undertakings to have joint guidance in place for inspecting and capturing details of the contamination observed following an adhesion or Wrong side track circuit failure incident.	4	G2.4.5	OB	DC	Added suggested text to clause G2.4.5
34	10	2.4.4	In addition to the recommended checks on any RS involved in a low adhesion event, should there not also be a requirement to check and record (photograph) the railhead condition at and around the site of the incident and to investigate the	Modify the current guidance accordingly “It is good practice to arrange post-incident checks of the following: (a) rolling stock, including	6	G2.4.4	OB	DC	Added suggested text.

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			operation of the mitigation trains over that site during the previous 24 hours?	examining wheels for contamination and analysis of train braking performance before entering service. (b) railhead condition at and approaching the site of the incident; photographs shall be taken of any visible railhead contamination (c) Operation of all mitigation trains over the incident site during the previous 24 hours (d) RIS-3708-TOM sets out requirements for special working arrangements for any location affected by wrong-side track circuit failures caused by leaf-fall contamination.					
35	11	2.5.3	Suggest adding changes in service pattern such as a reduction in the interval between trains, an increase in the maximum speed of the trains or the replacement of an existing RS.	Add (h) Change in the service frequency (i) Change in the maximum permitted speed of the trains (j) Replacement of a RS fleet	6	G2.5.3 g) h) i)	OB	DC	Added suggested text.
36	11	2.5.3c	It states to review the plan when conditions become reportable. On Wessex network this year there were 80+ ROLAs reported. If you had to review every time this would be just chasing paper instead of taking action	Add in some additional caveats such that there have been 2 reports of reportable conditions within a 12 hour period.	5	G2.5.3 b)	OB	DC	Added additional text as suggested.
37	12	A 1.1	Level crossing are mentioned in A3.1, but the guidance in A1.1 seems constrained to the SPAD prediction associated with them.	A 1.1	7	A1.1 p)	OB	DC	Added to list in A1.1

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			This would benefit from including other options, such as the control and management for level crossings (timings, stopping/non stopping mode, blocking arrangements etc)						
38	12	A1.1 (l)	Top-of-rail friction modifiers are not normally applied to enhance friction. They are designed to give intermediate friction. They would not normally be suggested as a mitigation for low adhesion. The terminology around products is not entirely clear I think though. I have seen “adhesion modifiers” used as a term for “traction gels” which could be laid down on the top-of-the-rail, is this what was meant?	I would make it clear is a traction gel being laid down on the top-of-the-rail – from a RHTT?	8	A1.1m)	OB	DC	Noted, changed wording to top-of-rail material.
39	13	A6	Suggest adding a new section to identify Operational Risks arising from Mitigation Measures Failures	Add new section A6 “The site-specific plan should consider the potential impact of planned mitigation measures not being available and identify appropriate alternative measures that would need to be implemented. Possible issues that should be considered (but not limited to) are a) Mitigation train failure or mitigation application equipment failure prevents mitigation train operation. b) Lack of mitigation train crew prevents mitigation train operation. c) Mitigation train is prevented	6	2.3.2 A.5.1 e)	OB	DC	A new requirement that has the intent of the suggestion has been added: ‘Where an existing control measure has been identified to be ineffective or unavailable, such as the missed run(s) of a rail head treatment train, the infrastructure manager shall implement alternative mitigation measures without delay’. In addition, alternative measures have been added to Appendix A. A.5.1 b)

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				from operating on part or all of its planned (timetabled) path due to engineering works being undertaken. d) Lineside devices (e.g. TGAs) inoperative due to a failure or not having been refilled.					
40	12	Appendix A, A1.1.	Suggest adding a new sub clause © concerning the operation of leaf fall mitigation trains to supplement the existing clause (b).	(c) The operation of leaf fall mitigation trains/vehicles such as RHTTs, MPVs etc.	6	A1.1 c)	OB	DC	Added suggested text.
41	12	Appendix A, A1.1.	Consider adding a new clause to define the required low adhesion braking performance for any rolling stock operating over that site. If this is not currently achievable for a particular fleet of trains, then this could require additional mitigation measures – e.g. temporary speed restrictions.	Add a requirement that “Under conditions of ‘reportable rail adhesion’ (revised definition), trains operating over this site shall be equipped with the ability to achieve the ‘dry rail’ stopping distances for the braking step (as defined in the driving guidance) through the operation of train borne WSP and adhesion improving systems, in conjunction with the use of an increased brake demand.”	6	N/A	OB	NC	This is covered by A1.1 e) iv), which gives examples of trainborne equipment fitted to trains as measures to control risks of low adhesion, this also mentions sanding equipment and that GMRT2461 sets out those requirements.
42	14	Appendix B4	Suggest that it is good practice to routinely test driver response to low adhesion conditions either through cab riding or use of simulators. At present drivers are generally trained in low adhesion on the simulator but existing drivers are not, so there is a variation due to changes in practice over the years.	Add sub clause d) Use simulators or other tools to ensure consistency of approach in poor rail conditions.	4	B4 c)	OB	DC	Added suggested text.

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43	15	Definitions	The current definition of “reportable rail adhesion Level” [Rail adhesion is worse than would be expected (by the driver) for the location and environmental conditions] is considered unsatisfactory.	Suggest definition for “reportable rail adhesion level” is changed to the following: “Rail adhesion is below that required to support the defined driving technique for the location, time of year and environmental conditions.” [Note that adhesion below that required to support the defined driving technique should be readily identifiable to a driver since it should result in WSP activity on the leading bogie/vehicle.	6	N/A	OB	NC	The term ‘reportable’ is defined in Rule Book module TW1, section 28.1. As a result of comment number 9, the term ‘reportable’ is no longer used in this standard, therefore the definition has been removed. Once the RAIB investigation findings are available RSSB will determine whether there is a need to change the definition and will initiate a change process.
44		general	The review of this document may also need to take account any findings from the RAIB investigation into the Salisbury collision.		5		OB	NC	There are no fixed dates for the publication of the findings from the RAIB investigation. That would mean a delay of several months to publish the standard and the industry would not see the benefits of this work. By publishing the standard in June 2022, the industry would be able to adopt the standard in preparation for the leaf fall season and realise early benefits. Once the RAIB investigation findings are available RSSB will determine whether the standard already covers any possible recommendations and if not, RSSB will initiate a standards change process.
45		General	Whilst accepting that the investigation into the collision at Fisherton Tunnel on 31/10/2021 is not yet complete, any update to this Standard should take account of this incident. How is it proposed to align this Standard or modify it to take account of any preliminary	It would seem inappropriate to proceed with publication of this revision without ensuring that any issues identified with regard to the collision are incorporated.	6		OB	NC	See response to comment number 44.

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			finding from the Fisherton Tunnel enquiry?						
46	11	Guidance	It may be beneficial to include the reference to the adhesion manual as a useful source of information and good practice?	Guidance	7	Other references	OB	DC	Added suggested reference.
47		Synopsis	The existing text makes no reference to any requirement to implement mitigations or monitor their effectiveness.	Amend the text as suggested “This standard sets out a framework to Develop, <i>implement, and monitor the effectiveness of</i> site-specific plans to manage low adhesion at identified high-risk sites, which helps transport operators to control risks, mitigate hazards and improve safety and performance in preparation for low adhesion conditions.	6	Synopsis	OB	DC	Reworded to include suggested text.
48		various	OTMR should read OTDR in accordance with the Rule Book	Change to OTDR	5	various	OB	DC	Changed to OTDR.
49	7	2.1.1	Should also include the requirement to mark the high-risk area with signage.	Amend text: 2.1.1 Infrastructure managers shall: a) Identify sites of high-risk where low adhesion between the wheel and rail may occur; b) Publish the details of high-risk sites in the sectional appendix or equivalent document; and c) Agree the list of high-risk	5	2.1.1 d)	OB	DC	Reworded to include suggested text.

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				sites with relevant parties; and d) Warn drivers of the potential risk of low adhesion, using signage, AK210 to mark the start point, and AK214 to mark the end point of the high-risk site.					
50	9	G2.2.9	Collaboration should include driver health and safety reps.	G 2.2.9 Effective collaboration is achieved by identifying and involving relevant parties for each high-risk site, including: a) The infrastructure manager; b) Railway undertakings that run services over the high-risk site; c) Operators of railhead treatment trains; d) Operators of on-track maintenance vehicles; and e) Driver health and safety representatives.	5	G2.2.9 e)	OB	DC	Reworded to include suggested text.