

Study Group **WAGON USERS**

Proposed amendment to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Claude Weis	20/1/16		Drafted following TI WG meeting of Oct 2015
Jean-Marc Blondé	30/3/16		Amended following TI WG meeting of March 2016
Approved by TI WG	31/3//16		See minutes of TI WG meeting of March 2016

Title:	Add vehicle keeper marking (VKM) to Annex 1
Proposed amendment made by: RU / keeper / other body	Developed by CFL Cargo
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Claude Weis, CFL Cargo
Location, date:	Dudelange, 20/1/2016
Concise description:	Add a code to Appendix 9, Annex 1, stipulating the need for a vehicle keeper marking, as provided for by EN 15877-1 (2012).

1. Starting-point (current situation):

1.1. Introduction

Appendix 9, Annex 1 does not currently contain a requirement for the keeper's details to be marked on the wagon.

1.2. Mode of operation

1.3. Anomaly / description of problem

EN 15877-1 (2012), point 4.5.1 states that the vehicle keeper marking (VKM) must be marked on the wagon. This information is mandatory if the full company name and address is not indicated. If neither the VKM nor the keeper's full address is indicated, there is no guarantee that the obligations of GCU article 18.1 will be met.

1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?

No Yes (state which): EN 15877-1

* "Code of practice: a written set of rules that, when correctly applied, can be used to control one or more specific hazards."
(source: Regulation EC 352/2009, Article 3)

"Technical provisions laid down in writing or conveyed verbally and pertaining to procedures, equipment and modes of operation which are generally agreed by the populations concerned (specialists, users, consumer and public authorities) to be suitable for achieving the objective prescribed by law, and which have either proven their worth in practice or, it is generally agreed, are likely to within a reasonable period of time" (translation/source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

Add a point to 6.1.1 stating that either the VKM or the keeper's full address must be marked on the wagon.

3. Additional text (relates only to proposed amendments to GCU Appendix 9):

We request amendment of codes 6.1.1.8 (Appendix 9, Annex 1) in line with the table below:

Component	Code	Irregularities/Criteria/Notes	Action to be taken	Category
Wagon body	6.			
Wagon body in general	6.1			
Markings on wagons	6.1.1	Missing, illegible or incomplete		
	6.1.1.1	- Wagon number ⁵⁾	Detach wagon	4
	6.1.1.2	- "RIV" sign, "TEN-RIV", "TEN"+"GE" or acceptance marking ("TEN"+ "G1", country acronym in approval plate) ⁵⁾ or	Detach wagon	4
	6.1.1.3	- agreement plate (if showing exchange codes 41, 43, 45, 81, 83 or 85) ⁵⁾ or an acceptance marking ("TEN"+"CW" + country acronym in approval plate) ⁵⁾	Detach wagon	4
	6.1.1.4	- tare weight ⁵⁾	Detach wagon	4
	6.1.1.5	- braked weight of hand brake ⁵⁾	Detach wagon	4
	6.1.1.6	- load limits ⁵⁾	Detach wagon	4
	6.1.1.7	- capacity of tank wagons ⁵⁾	Detach wagon	4
	6.1.1.8	- VKM and full address of wagon keeper ⁵⁾ reserved	Detach wagon	4

⁵⁾ If this irregularity is found only on one side of the wagon, affix K.

4. Reason:

This information is mandatory under EN 15877-1.

5. Assess potential positive/negative impacts

E.g. on operations, costs, administration, interoperability, safety, competitiveness, etc., using a scale of 1 (very low) to 5 (very high).

Justify observations

Impacts:

Operations, Interoperability, Safety, Competitiveness: (Value: 3).

This change will ensure compliance with EN 15877-1.

Safety (Value: 4).

This change will ensure that the keeper of each wagon can be identified.

6. Safety appraisal of proposed amendment

Description of actual/target system, and scope of change to be made (see points 1 and 2).

Safety appraisal performed by: not needed, since adaptation results from the aforementioned standards.

6.1. Does the change made impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reasoning: x	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reasoning: see template Attach the "significant change" test template.	
6.3. Determining and classifying risk:	<input checked="" type="checkbox"/> N/A
6.3.1. Effect of change in normal operation: 6.3.2. Effect of change in the event of disruption / deviation from normal operation: 6.3.3. Potential misuse of system: <input type="checkbox"/> No <input type="checkbox"/> Yes (describe possible misuse):	
6.4. Have safety measures been applied?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
<i>For each type of risk, one of the following risk acceptance criteria is to be selected:</i> <ul style="list-style-type: none"> • <i>Code of practice</i> • <i>Use of reference system</i> • <i>Explicit risk estimate</i> 	
6.5. Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body: Attach the verdict reached by the assessment body:	[appendix]