Amendment proposal to GCU Appendix 10

Amendment history

Amendment made by	Date	Paragraph	Amendment
Mario Tute, ERFA	2018/11/16 2018/11/23	6.39+Ann6 App10	First proposal draft
Dirk Oelschläger, UIC	2019/2/19		Correction of obvious mistakes and alignment of language versions
WG UIC Maintenance	2019/4/4	6.39+Ann6 App10	Final version
Wagon User UIC Study Group	2019/5/22	6.39+Ann6 App10	Approval
GCU CC	2019/6/18		Approval

Title	Updating of Appendix 10, Part A - Corrective Maintenance
Proposed amendment made by (RU / keeper / other body):	ERFA / VTG Rail Europe GmbH
Proposed amendment concerns:	6.39+Ann6 App10
Proposer:	Mario Tute
Location, date:	2018/11/23
Concise description:	Defective tarpaulins are mentioned in Appendix 9, but the corresponding measures to be taken are not provided in Appendix 10.

1. Starting point (current situation):

1.1. Introduction

In Appendix 9, Annex 1 (catalogue of irregularities), 7.5.5.1., “tarpaulin torn, holed ≤ 30 mm” is given as the remedial action to be taken and in 7.5.5.2, “tarpaulin torn, holed ≤ 30 mm”, “detach” is given as the measure to be taken. In Appendix 9, Annex 5, the inspection catalogue as per Annex 1 contains the codes 6.6.1. 2 and 6.6.1.3 with the inspection characteristics “visual check” (VC) and “measurement” (M). Appendix 10, 6.39 contains only the passage: “Additional provisions for mechanically sheeted wagons: It must be possible to close and lock the mechanical sheeting correctly (indicator visible). This applies to the end hoops’ top locking system”. Remedies for the irregularities above are not provided. This shortcoming should be remedied.

1.2. Mode of operation

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1.3. Anomaly / description of problem:

Regulatory gap: Remedies for the irregularities above are not provided. This shortcoming should be remedied.

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

☒No ☐ Yes (state which):

* “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" (Source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

Introduction of repair methods for tarpaulins in order to ensure operating safety and clearance.
Introduction of two subpoints:

6.39.1 It must be possible to close and lock the mechanical sheeting correctly (indicator visible). This requirement also applies to the ~~locking system for the end hoops.~~ end hoops' top locking system.

6.39.2 Provided that no repair instructions have been provided by the keeper, repairs are carried out using a repair kit on the basis of cold bonding in accordance with the instructions provided by the repair kit manufacturer.

Inclusion of additional relevant CU codes in Appendix 6

Appendix 10 – Annex 6

GCU Intervention code	Intervention(s)	Any additional information necessary	Inspection as per Appendix 9	Rules as per Appendix 10
CU63900	Mechanical sheeting inspection		6.6.1.2; 6.6.1.3	6.39.1
CU63901	Repair mechanical sheeting		6.6.1.2; 6.6.1.3	6.39.2

Colour code for changes:
Black: Current text, for info and remains unchanged
Blue: New text
Strikethrough blue text: text will be deleted

3. Additional text and/or changes relate only to proposed amendments to GCU Appendix 10

We are asking for amendments of 6.39+Ann6 App10 according the above changes proposal.

4. Reasoning:

By introducing repair measures, clear handling instructions will be provided to workshops in order to prevent cracks increasing in size or damage.

5. Assess potential positive/negative impacts

Assess the possible positive and negative effects (operations, costs, administration, interoperability, safety, competitiveness, etc.) on a scale of 1 (very low) to 5 (very high). Justify observations

Impacts on costs, administration, interoperability, safety, competitiveness:

Costs: 2 (by applying the operating instructions provided by the keeper, further damage to mechanical sheeting on wagons will be prevented)
Administration: 2 (information has to be collected and employees must be trained accordingly)
Interoperability: 1 (no impact)
Safety: 2 (The workshop performs the work in accordance with the manufacturer's/keeper's instructions)
Competitiveness: 2 (Innovations are legally covered)

6. Safety appraisal of proposed amendment

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

The risk assessment is rendered invalid inasmuch as only recognised regulations are implemented.

Risk assessment conducted by:

6.1. Does the change made impact on safety?	☒No ☐ Yes
Reasoning: No change to the target status; improved operating safety in workshops with regard to tarpaulin repairs.	
6.2. Is the change significant?	☒No ☐ Yes
Reasoning: Clarification of procedure. No change to existing instructions.	
6.3. Determining and classifying risk:	☒ 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: ☐ No ☐ Yes (describe possible misuse):	
6.4. Have safety measures been applied?	☒No ☐ Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: • *Code of practice* • *Use of reference system* • *Explicit risk estimate*	
6.5. Has a risk analysis been submitted to the assessment body?	☒No ☐ Yes
Assessment body: Attach the verdict reached by the assessment body:	[Appendix]