

## Proposed amendment to GCU Appendix 9

### Record of amendments

Amended by	Date	Paragraph	Amendment
Francesco Garrisi	28/09/2018	Loading Guidelines 9.4	Drafted following TTI WG meeting of Jan 2017
Jean-Marc Blondé	20/03/2019		Amended following TTI WG meeting of March 2019
Approved by TTI WG	20/03/2019		As per TTI WG, March 2019
Approved by WU SG	22/05/2019		As per minutes of WU SG meeting

<b>Title:</b>	
<b>Proposed amendment made by: RU / Keeper / other body:</b>	Mercitalia (MIR) on behalf of the Loading Guidelines WG
<b>Proposed amendment concerns:</b>	<input checked="" type="checkbox"/> Appendix 9 <span style="margin-left: 200px;"><input type="checkbox"/> Appendix 11</span>
<b>Proposer:</b>	Francesco Garrisi
<b>Location, date:</b>	Florence, 28/09/2018
<b>Concise description:</b>	<p>Amendment of GCU Appendix 9, Annex 1, Point 7.7.5 in accordance with the amendments to Loading Guidelines 9.4 Volume 2 agreed by the group, namely:</p> <p>The provision for semi-trailer underrun bumpers not being raised/pushed up is not applicable for recess wagons type 1 and 2 and in the case of wagons marked with one of the following compatibility codes: a, b, c or d</p>

## 1. Starting point (current situation)

### 1.1. Introduction

The Loading Guidelines group has approved the amendment of Volume 2, Method 9.4, whereby loading semi-trailers on recess wagons with extended clearance envelopes is permitted without the need to raise the underrun bumper:

For pocket wagons with extended envelope space (indicated by one of the compatibility codes: e, f, g, h, i, etc.), the lateral and rear underrun protection devices do not have to be raised.

It is therefore necessary to amend Appendix 9, Annex 1, Point 7.7.5 in order to bring the GCU into conformity with the Loading Guidelines.

### 1.2. Mode of operation

### 1.3. Anomaly/Description of problem

Semi-trailers with underrun bumpers are not permissible in the existing text (see 7.7.5).

7.7.5	Underrun bumpers of semi-trailer, due to their design, not raised/pushed in, without contact with carrier wagon	Rectify (raise/push in and lock)
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However, with the amendment of Volume 2, 9.4, it is not necessary to raise semi-trailer underrun bumpers loaded on recess wagons (marked with one of the compatibility codes: e, f, g, h, i).

There is a need to make both texts consistent with each other in order to avoid application of unnecessary follow-up measures.

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

No       Yes (state which): UIC Leaflet 596-5, extended clearance envelope

\* 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] No. 352/2009, Article 3 section 19).

“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: German Ministry of Justice: Handbuch der Rechtsförmlichkeit, recital 255)

## 2. Target situation (goal)

Consistency between the Loading Guidelines and Appendix 9, Annex 1, Point 7.7.5.

## 3. Amendment proposal

Colour code for changes:

**BLACK:**..... actual text, for info and remains unchanged

**RED:** ..... added or modified text

**BLUE and struck out:**..... text will be deleted

We request amendment of Appendix 9 in accordance with the proposal below:

Loading of load units (ILU)	7.7.5	Underrun bumpers of semi-trailer <del>due to their design</del> , not raised/pushed in, without contact with carrier wagon  – on recess wagon without compatibility codes  – on recess wagon marked with one of the following compatibility codes: a, b, c or d	Rectify (raise/push in and lock)
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## 4. Reason

It is possible for rear underrun bumpers not to be raised/pushed in when loading semi-trailers on recess wagons with extended clearance envelopes.

## 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*

Positive impacts: (value) Operations: 3  
 Interoperability: 3  
 Competition: 3  
 Costs: 3  
 Administration: 3  
 Safety: 3

## 6. Safety appraisal of proposed amendment

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

Safety study conducted by:

<b>6.1. Does the change make impact on safety?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: Harmonisation of information provided to employees	
<b>6.2. Is the change significant?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
<b>6.3. Determining and classifying risk</b>	<input type="checkbox"/> not applicable
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 checked="" type="checkbox"/> No  <input type="checkbox"/> Yes (describe possible misuse):	
<b>6.4. Have safety measures been applied?</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: <ul style="list-style-type: none"> <li>• "Code of practice" (acknowledged technical rules)</li> <li>• Use of reference system</li> <li>• Explicit risk estimate</li> </ul>	
<b>6.5. Has a risk analysis been submitted to the assessment body?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body:	
Attach the verdict reached by the assessment body	[appendix]