

## Amendment Proposal to GCU Appendix 10

### Record of amendments

Amended by	Date	Paragraph	Amendment
André Brozy, UIP	14/10/2020	Appendix 10, Chap. 0 Principle	Drafting of proposal
André Brozy, UIP	26/01/2021	Appendix 10, Chap. 0 Principle	See minutes of TTI WG meeting of December 2020
Maintenance WG decision	20/04/2021	Appendix 10, Chap. 0 Principle	See minutes of Maintenance WG meeting of April 2021
WU SG decision	23/04/2021	Appendix 10, Chap. 0 Principle	See minutes of WU SG meeting of April 2021
GCU JC decision	14/06/2021	Appendix 10, Chap. 0 Principle	Approved

<b>Title</b>	Supplement to Chapter 0 Principle, GCU Appendix 10
<b>Proposed amendment made by (RU / keeper / other body):</b>	WG Maintenance
<b>Proposed amendment made by</b>	<input checked="" type="checkbox"/> Annexe 10
<b>Proposer:</b>	WG Maintenance, A. Brozy
<b>Location, date:</b>	14.10.2020
<b>Concise description:</b>	Supplement to Chapter 0 Principle, GCU Appendix 10 by an additional recommendation concerning removal of oil crayon markings according to GCU Appendix 9

**1. Starting point (current situation):****1.1. Introduction**

Appendix 10 of the GCU sets out the conditions for repairs to damage marked in accordance with Annex 9 of the GCU. Due to additional hard-to-see marking damages by RU's wagon technical inspection staff (Amendment A2020-11, Appendix 9 Annex 11), damage may be marked with oil crayon prior to a workshop visit.

**1.2. Mode of operation**

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**1.3. Anomaly / description of problem**

The current version of GCU Appendix 10 doesn't contain a regulation concerning the removal of hidden, hard-to-see marking damages. It could be possible that properly repaired wagons or parts are still marked with oil crayon when leaving the workshop.

- This complicates technical inspections by RU staff
- After ability to run of wagons it is not possible to distinguish between repaired and not repaired damages without checking all markings, especially in case of a transport into another workshop to fulfil the maintenance

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

**2. Target situation****2.1. Resolution of the error/issue (envisaged solution)**

Recommendation in Annex 10 AVV Chapter 0 Principle stating that existing damages' trackings or markings to freight wagons must be removed after they have been repaired and before they are handed over to an RU for onward carriage.

### 3. Additional and/or amended text (relates only to proposed amendments to GCU Appendix 10):

Amendment colour code:

**Black:** Current text, for info and remains unchanged

**Red:** new text

**Blue:** (if crossed out): text to be deleted

#### A. CORRECTIVE MAINTENANCE

##### 0. PRINCIPLE

Wagon keepers, customers of repair work and workshops must all ensure that wagons are free from defects that are liable to lead to the vehicle being removed from service again, based on the provisions of Appendix 9 on the instructions issued for repairs to be carried out and Appendix 10, Chapter A (and where appropriate also Chapter B) on the actual execution of repair work.

If a RU has marked damages on a freight wagon to be repaired in accordance with Appendix 9, Annex 11 of the GCU before the wagon is brought into a workshop, these markings must be removed by the workshop before the wagon is handed over to an RU. Any marking on the wagon or its parts regarding non-repaired damages must remain.

Chapter A of Appendix 10 contains criteria and guidance to be applied by workshops to remove irregularities as understood by Appendix 9. The measures carried out and documented under Appendix 9 (e.g. Annex 12) do not need to be repeated under Appendix 10.

It is not necessary to apply the whole of Chapter A of Appendix 10 each time a wagon is sent to a workshop, only those provisions relating to the damage that is to be repaired.

Irrespective of the reason for a wagon's withdrawal from service, compliance with those provisions that are marked with an asterisk (\*) is required systematically whenever a wagon is sent to the workshop.

If the workshop is not in a position to restore the wagon to the minimum specified condition, the vehicle must be handled in accordance with the keeper's instructions (procedure as per Appendix 9).

### 4. Reason:

#### 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):*  
Reasoning behind amendment:

Impact on costs/administration/interoperability/safety/competitiveness:

Costs: 3 (low impact of maintenance costs)

Administration: 3 (no additional information transmitted)

Interoperability: 1 (no impact)

Safety: 3 (avoid stresses with TI owing to App9 GCU)

Competitiveness: 1 (no impact)

## 6. Safety appraisal of proposed amendment

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

Performance of risk analysis is unnecessary where only recognised standards are implemented.

Risk analysis conducted by:

<b>6.1. Does the change made impact on safety?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: no intervention in the wagon	
<b>6.2. Is the change significant?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: no intervention in the wagon	
<b>6.3. Determining and classifying risk:</b>	<input checked="" type="checkbox"/> N/A - 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 type="checkbox"/> No <input type="checkbox"/> Yes (describe possible misuse):	
<b>6.4. Have safety measures been applied?</b>	<input checked="" type="checkbox"/> No <input 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"> <li>• Code of practice</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]