Amendment Proposal to 
GCU Appendix 10

Amendment history

<table>
<thead>
<tr>
<th>Amendment made by</th>
<th>Date</th>
<th>Paragraph</th>
<th>Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Luca Mandelli Hupac Intermodal SA</td>
<td>19/01/2021</td>
<td>Appendix 10, Annex 6 – codes CU60420 and CU60421</td>
<td>Annex 6 – codes CU60420 and CU60421 add damage codes from Appendix 9 6.7.1.1, 6.7.1.2 and 6.7.2</td>
</tr>
<tr>
<td>Luca Mandelli Hupac Intermodal SA</td>
<td>26/01/2021</td>
<td>Appendix 10, Annex 6 – codes CU60420 and CU60421</td>
<td>Amendment Proposal Sheet</td>
</tr>
<tr>
<td>Maintenance WG decision</td>
<td>20/04/2021</td>
<td>Appendix 10, Annex 6 – codes CU60420 and CU60421</td>
<td>See minutes of Maintenance WG meeting of April 2021</td>
</tr>
<tr>
<td>WU SG decision</td>
<td>23/04/2021</td>
<td>Appendix 10, Annex 6 – codes CU60420 and CU60421</td>
<td>See minutes of WU SG meeting of April 2021</td>
</tr>
<tr>
<td>GCU JC decision</td>
<td>14/06/2021</td>
<td>Appendix 10, Annex 6 – codes CU60420 and CU60421</td>
<td>Approved</td>
</tr>
</tbody>
</table>

Title

Supplement to Annex 6 Appendix 10 – codes CU60420 and CU60421

Proposed amendment made by (RU / keeper / other body):

ERFA/Hupac Intermodal SA

Proposed amendment concerns:

Appendix 10

Proposer:

Luca Mandelli

Location, date:

Chiasso, 19/01/2021

Concise description:

Damage codes from Appendix 9: 6.7.1.1, 6.7.1.2 and 6.7.2 must be added in CU60420 and CU60421 codes
1. **Starting point (current situation):**

<table>
<thead>
<tr>
<th>1.1. <strong>Introduction</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Inclusion of damage codes from Appendix 9: 6.7.1.1, 6.7.1.2 and 6.7.2 in Annex 6 Appendix 10, codes CU60420 and CU60421</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1.2. <strong>Mode of operation</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The damage codes 6.7.1.1, 6.7.1.2 and 6.7.2 in Appendix 9 are not listed in Annex 6 Appendix 10, codes CU60420 and CU60421</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1.3. <strong>Anomaly / description of problem:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The damage codes 6.7.1.1, 6.7.1.2 and 6.7.2 in Appendix 9 are not coded in Annex 6 Appendix 10, codes CU60420 and CU60421</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1.4. <em><em>Does this concern a recognised code of practice</em> (e.g. DIN, EN)?</em>*</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ No ☐ Yes (state which):</td>
</tr>
</tbody>
</table>

*“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**

<table>
<thead>
<tr>
<th>2.1. <strong>Elimination of anomaly/problem (goal)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Inclusion of damage codes from Appendix 9: 6.7.1.1, 6.7.1.2 and 6.7.2 in Annex 6 Appendix 10, codes CU60420 and CU60421</td>
</tr>
</tbody>
</table>
3. Additional text/modification (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

Annex 6 Appendix 10:

<table>
<thead>
<tr>
<th>GCU intervention code</th>
<th>Intervention(s)</th>
<th>Any additional information necessary</th>
<th>Inspection as per Appendix 9</th>
<th>Rules as per Appendix 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>CU60420</td>
<td>Check seating plates, plate bolts, securing chains and chain eyes</td>
<td></td>
<td>6.6.3.3</td>
<td>6.42</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.1.1</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.1.2</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.2</td>
<td></td>
</tr>
<tr>
<td>CU60421</td>
<td>Restore seating plates, plate bolts, securing chains and chain eyes to working order</td>
<td></td>
<td>6.6.3.3</td>
<td>6.42</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.1.1</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.1.2</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>6.7.2</td>
<td></td>
</tr>
</tbody>
</table>

4. Reason:

Link the damage codes 6.7.1.1, 6.7.1.2, 6.7.2 in Appendix 9 with the codes in Annex 6 of Appendix 10

App9 Ann1:

<table>
<thead>
<tr>
<th>Gear for securing load units (ILU) on carrier wagons</th>
<th>6.7.1.1</th>
<th>– trestle not in use</th>
<th>K</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>6.7.1.2</td>
<td>– trestle in use</td>
<td>Rectify +K. If not possible, detach wagon</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>6.7.2</td>
<td>Coupling pin of trailer not locked into trestle</td>
<td>Lock. If not possible, detach wagon</td>
<td>5</td>
</tr>
</tbody>
</table>

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:

Impacts:
- Operations: 1
- Interoperability: 1
- Costs, administration: 2
- Safety: 2
- Competitiveness: 1
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:

<table>
<thead>
<tr>
<th>6.1. Does the change made impact on safety?</th>
<th>☒No ☐ Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reasoning:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6.2. Is the change significant?</th>
<th>☒No ☐ Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reasoning:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6.3. Determining and classifying risk:</th>
<th>☒N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.3.1. Effect of change in normal operation:</td>
<td></td>
</tr>
<tr>
<td>6.3.2. Effect of change in the event of disruption / deviation from normal operation:</td>
<td></td>
</tr>
<tr>
<td>6.3.3. Potential misuse of system:</td>
<td>☐ No  ☐ Yes (describe possible misuse):</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6.4. Have safety measures been applied?</th>
<th>☐No ☐ Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>For each type of risk, one of the following risk acceptance criteria is to be selected:</td>
<td></td>
</tr>
<tr>
<td>• Code of practice</td>
<td></td>
</tr>
<tr>
<td>• Use of reference system</td>
<td></td>
</tr>
<tr>
<td>• Explicit risk estimate</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6.5. Has a risk analysis been submitted to the assessment body?</th>
<th>☒No ☐ Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assessment body:</td>
<td></td>
</tr>
<tr>
<td>Attach the verdict reached by the assessment body:</td>
<td>[Appendix]</td>
</tr>
</tbody>
</table>