Amendment Proposal to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Lukas Joa	15/12/2020	Appendix 9, 3.2.4 4.3.4	Drafted
Lukas Joa	25/01/2021	Appendix 9, 3.2.4 4.3.4	Amended as per meeting
TTI WG decision	23/03/2021	Appendix 9, 3.2.4 4.3.4	See minutes of TTI WG meeting of March 2021
WU SG decision	23/04/2021	Appendix 9, 3.2.4 4.3.4	See minutes of WU SG meeting of April 2021
GCU JC decision	14/06/2021	Appendix 9, 3.2.4 4.3.4	Approved

Title:	Superordinate code for reporting non-coded irregularities (DBC)
Proposed amendment made by (RU/keeper/other body):	DB Cargo AG
Proposed amendment concerns:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Lukas Joa
Location, date:	Mainz, 18/09/2020
Concise description:	The catalogue of irregularities in Appendix 9, Annex 1 is not an exhaustive list of all defects. A superordinate damage code should therefore be used for damage/defects not listed in the catalogue.

1. Starting point (current situation):

1.1. Introduction

As per the minutes from October 2016 (approved at meeting of 31/01/2017 in Paris), the use of superordinate codes has been approved. This approval must now be incorporated into Appendix 9 (treatment of defects not listed in Appendix 9, see below).

9. Discussion: How to deal with non-listed defects (in Appendix 9)

The TTI WG discussed the notification of anomalies not listed in Appendix 9 (non-comprehensive list) and those that are still within the tolerance ranges (e.g. in case of flat wheels). The study of the operating procedure must be carried out in depth as part of the procedure (point 8). For this purpose, it is necessary to have a definition of both terms: "damage" and "defect".
If a damage is not listed in Appendix 9 the superordinate code can be used.
If a tolerance is not exceeded there is no damage.

1.2. Mode of operation

1.3. Anomaly / description of problem:

The catalogue of irregularities in Appendix 9, Annex 1 is not an exhaustive list of all damage/irregularities. Where there are other irregularities not listed in this document, but which might well compromise operating safety or the wagon's railworthiness, qualified staff shall take whatever action they deem necessary. Issues can arise in relation to the transmitted damage codes selected by personnel.

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" (translation/source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

A superordinate damage code should be used for damage/irregularities not listed in the catalogue.

3. Amendment/additional text (relates only to proposed amendments to GCU Appendix 9):

Colour codes for amendment proposals:
Black: currently applicable text; provides information and remains unchanged
Red: New text
Blue (may be crossed out): Text to be deleted

3.2.4 This appendix is not an exhaustive list of all the irregularities which might occur. Where there are other irregularities not listed in this document, but which might well compromise operating safety or the wagon's railworthiness, qualified staff shall take whatever action they deem necessary. Such irregularities are to be documented by means of the superordinate code applicable in context to the part/components/aspect in question and are to be assigned to at least the second grouping level.
4.3.4 Irregularities not listed in this document, but which might well compromise operating safety or the wagon's railworthiness must be assigned to irregularity class 3 at least.

4. Reasoning:

Using superordinate codes for unlisted irregularities makes it easier for personnel to decide which code to use for documentation and establishes a harmonised procedure.

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:
Operations, Interoperability, Competitiveness, Costs, Administration (value: 3)

Safety (value: 4).

6. Safety appraisal of proposed amendment

Description of actual/target system, and scope of change to be made (see points 1 and 2).
No need for a risk assessment since a code of practice was applied.

Safety appraisal done by:

6.1. Does the change made impact on safety?	☐No ☒ Yes
Reasoning: Documentation of irregularities by means of codes is relevant to safety.	
6.2. Is the change significant?	☒No ☐ Yes
Reasoning: Innovation = low, as the use of codes is already an established procedure, Complexity = low, as the number of interfaces is low and the procedure involves the use of existing aspects of policy, Consequences of failure = minimal, as staff are trained to assess irregularities, Traceability = high, as the effects are tested using proven procedures (quality control, damage reports, etc.) The change is reversible, as the changes can be adapted retrospectively during the cycle (one year) or modified through other procedures.	
6.3. Determining and classifying risk:	☐ N/A
6.3.1. Effect of change in normal operation: personnel use the superordinate code to document irregularities. Irregularities identified are documented correctly. 6.3.2. Effect of change in the event of disruption / deviation from normal operation: personnel use incorrect codes to document irregularities. Irregularities are not documented with the correct code. - Irregularities are transmitted incorrectly. - Irregularities cannot be identified by the next RU involved in the operation. 6.3.3. Potential misuse of system: ☐ No ☒ Yes (describe possible misuse): Within the system: personnel may use superordinate codes deliberately for documentation.	
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: • The faults listed under 6.3.2 are not new risks brought about by the amendment; rather, they already exist.	
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]