Proposed amendment to Appendix 9 to the GCU

Record of amendments

Amended by	Date	Paragraph	Amendment
J. M. Blondé and TTI WG decision	28.02.2022	Point 4.7	Drafted and update in accordance with minutes of WG TTI 01-2022
WU SG decision	16.05.2022	Point 4.7	In accordance with minutes of WG TTI 05-2022
GCU JC decision	09.06.2022	Point 4.7	Approved

Title	Calculation of cumulative defect value, point 4.7
Proposed amendment made by RU/keeper/other:	DB Cargo AG
Proposed amendment to:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Stefan Zebracki/Lukas Joa/Jean-Marc Blondé
Location, date:	Video conference, 10/01/2022
Concise description:	For calculation of the cumulative value of defects, recurring component defects should be taken into account only once per wagon because, as per the proposal, they may be valued only once per wagon regardless of the component concerned.

1. Starting point (current situation):

1.1. Introduction

The current text offers the possibility of registering several defects at component level per wagon.

1.2. Mode of operation

If several defects are recorded per wagon, this affects the calculation of the cumulative defect value and presents an unrealistic snapshot of quality.

1.3. Anomaly / description of problem:

Irregularities are no longer to be calculated/recorded at component level, but rather at wagon level. However, if two defects in the same irregularity class are recorded for different components, only the higher irregularity class may be taken into account for calculation of the CDV.

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)

3. Amendments/additional texts (relate only to proposed amendments to GCU Appendix 9):

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

Extract from GCU Appendix 9 point 4.7

4.7 Defects and irregularities already dealt with by the RU that carried out the transfer inspection by applying the measures indicated in the catalogue of irregularities (Annex 1) are not to be considered as irregularities. If a wagon has been labelled by the RU that carried out the technical transfer inspection, only the irregularities that are not mentioned on the label may be taken into account for calculating the CDV ~~value~~.

~~Identical irregularities that occur on several sub-components (such as stanchions) are considered in principle as one irregularity per wagon or per load unit. The same applies to load residues and/or load securing equipment that has not been removed. Where irregularities on a given component or load have been given different classifications, only the irregularity in the higher class should be recorded~~
Identical irregularities that occur on components on a recurrent basis are taken into account once at wagon level for calculation of the cumulative defect value. Where existing irregularities have been given different classifications, only the irregularity in the higher class should be recorded for calculation of the CDV.

4. Reason:

If several defects are recorded per wagon, this affects the calculate of the CDV and presents an unrealistic snapshot of quality.

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, administration, costs (value: 3)

Safety (value: 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:

6.1. Does the change made impact on safety?	☒No ☐ Yes
Reasoning: the issue concerns the recording of defects after a train has run or during a quality control at the end of the journey	
6.2. Is the change significant?	☒No ☐ Yes
Reasoning: see template Attach the "significant change" test template.	
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]