

Amendment proposal Appendix 10 to the GCU

Record of amendments

Amended by	Date	Paragraph	Amendment
Charles Antoine ALAVOINE	07/12/2022	6.39.3	Drafting the proposal
WG Maintenance	31/01/2023	6.39.3	Update (see minutes of the Maintenance WG meeting)
WG MNT decision	18/04/2023	6.39.3	Update and approval (see minutes of the Maintenance WG meeting)
WU SG decision	23/05/2023	6.39.3	WU SG approval
GCU JC decision	07/06/2023	6.39.3	GCU JC approval

Title	Inserting item 6.39.3 in Appendix10 to adapt and take code 6.6.1.5 of Appendix 9 into account
Proposed amendment made by: RU/keeper/other:	WG Maintenance
Proposed amendment of:	<input checked="" type="checkbox"/> Appendix 10
Proposer:	C.A. Alavoine
Location, date:	Webconf., 29/11/2022
Concise description:	Checking slackened or severed tarpaulin ropes in Appendix 10 for harmonisation with code 6.6.1.5 of GCU Appendix 9

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

Following the validation of amendment AP-TTI-2022-04 by the WG TI, it is necessary to harmonise GCU Appendix 10 to this, which involves amending item 6.39 *Additional provisions for mechanically sheeted wagons* in Appendix 10. At the MNT WG meeting on 29/11/2022, TOP 3 was asked to draft an amendment accordingly (see TOP2.2_TO AG *Instandhaltung* Paris 29-30.11.22-en.docx)

1.2 Mode of operation

The GCU represents the core basis for contractual relationships between keepers and ECMs. The text must be clear so that it can be applied by all parties in a simple and unequivocal manner.

Harmonisation of Appendices 9 and 10 to the GCU, to be applied by members.

1.3 Anomaly/description of problem

The new proposal for Appendix 9 requires a revision of the paragraph *Additional provisions for mechanically sheeted wagons* in Appendix 10.

In Annex 9, there was previously only codes 6.1.1.1, 6.1.1.2, 6.1.1.3 and 6.1.1.4 for damaged or unserviceable mechanical parts and for tarpaulin condition checks.

An inspection should be added for checking the integrity of ropes that can be slackened or cut on wagons with mechanical sheeting (e.g. Rils, Tams, etc.)

The purpose of adding this inspection is to solve the problem and limit detachments leading to the subsequent immobilisation of wagons.

	6.6.1.5	Tarpaulin rope – slack or severed and visible from the outside	Secure + K, if not possible: detach wagon	4
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1.4 Does this concern a recognised code of practice* (e.g. DIN, EN)?

No Yes (state which):

* "a written set of rules that, when correctly applied, can be used to control one or more specific hazards." (Source: Regulation (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 – guide published by German Ministry of Justice)

2. Target situation**2.1 Elimination of anomaly/problem (solution sought)**

Introduce the concept of additional checks for tarpaulin ropes to pre-empt detachment when the wagon is returning to operation and to eliminate the risk of it being removed from operation.

3. Amendments/additional text (relates only to proposed amendments to GCU Appendix 10):

Amendment colour code:

Black: text in force remains unchanged, for information.

Red: new text

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

Additional provisions for mechanically sheeted wagons:

6.39.1 It must be possible to close and lock the mechanical sheeting correctly (indicator visible). This requirement also applies to the end hoops' top locking system.

6.39.2 Provided that no repair instructions have been provided by the keeper, repairs are carried out using a repair kit on the basis of cold bonding in accordance with the instructions provided by the repair kit manufacturer.

6.39.3 A good operating condition shall be maintained for the elements to hold and fasten sheeting. Relaxed (loose) ropes shall be re-tensioned and severed ropes shall be repaired or replaced.

Annex 6

GCU intervention code	Intervention(s)	Any additional information necessary	Technical inspection as per Appendix 9	Rules as per Appendix 10
CU63900	Mechanical sheeting inspection		6.6.1.2; 6.6.1.3	6.39.1
CU63901	Repair mechanical sheeting		6.6.1.2; 6.6.1.3	6.39.2
CU63930	Inspect elements to hold and fasten sheeting		6.6.1.5	6.39.3
CU63931	Repair elements to hold and fasten sheeting		6.6.1.5	6.39.3

4. Reason:

Harmonisation of Appendices 9 and 10 to the GCU

5. Evaluation of the possible positive and 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:

Positive effects:

(Value 5)

- on the costs, as badly positioned sheeting will, at a minimum, deteriorate prematurely.

(Value 3)

- on safety, as this damage may lead to a traffic incident and/or the breakage of network equipment.

Positive effects:

Operations, Interoperability, Safety, Competitiveness (Value 3)

Risk analysis 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:

Does the change have an impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
Determining and classifying risk	<input checked="" type="checkbox"/> N/A
<p>Effect of change in normal operation:</p> <p>Effect of change in the event of disruption/deviation from normal operation:</p> <p>Potential misuse of system:</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (describe possible misuse):</p>	
Have safety measures been applied?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
<p>For each type of risk, one of the following risk acceptance criteria is to be selected:</p> <ul style="list-style-type: none"> • Code of practice • Use of reference system • Explicit risk assessment 	
Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
<p>Assessment body:</p> <p>Attach the verdict reached by the assessment body</p>	[Appendix]