

Proposed amendment to GCU Appendix 9

Background

Amended by	Date	Paragraph	Amendment
Jean-Marc Blondé	30/11/2024	Appendix 9, new point 3.2.8	Drafted
Jean-Marc Blondé	08/02/2024	Appendix 9, new point 3.2.8	Updated according to TTI WG meeting of January 2024
Jean-Marc Blondé	19/03/2024	Appendix 9, new point 3.2.8	Updated according to TTI WG meeting of March 2024
TTI WG decision	19/03/2024	Appendix 9, new point 3.2.8	Approved according to TTI WG meeting of March 2024
WU SG decision	14/05/2024	Appendix 9, new point 3.2.8	Approved by WU SG
GCU JC decision	04/06/2024	Appendix 9, new point 3.2.8	Approved by GCU JC

Title	Measurements for technical inspections
Proposed amendment made by: RU/keeper/other:	SBB Cargo AG
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Jean-Marc Blondé
Location, date:	Olten, 30/11/2023
Concise description:	An essential detail has not yet been incorporated into Appendix 9. There is no mandatory quantitative measurement method, which regularly gives rise to debate. This proposal is intended to clarify the situation.

1. Starting point (current situation):

1.1. Introduction
The discussions between RUs and keepers continue to persist and the results of the wagon inspector's measurements are regularly called into question.
1.2. Mode of operation
No definition of the measurements
1.3. Anomaly/description of problem
Introduce a definition in 3.2 of Appendix 9 of which measurements are to be used during the technical inspections.
1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (state which):
<p>* "a written set of rules that, when correctly applied, can be used to control one or more specific hazards." (Source: Regulation EC 402/2013, Article 3)</p> <p>"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)</p>

2. Target situation

2.1. Elimination of anomaly/problem (goal)

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

Amendment colour code:

Black: Current text, for info and remains unchanged

Red: new text

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

3.2 Comments on the catalogue of irregularities

- 3.2.1 All the dimensions (values) quoted should be measured in cases of doubt.
- 3.2.2 The provisions of the Loading Guidelines (published separately) remain fully applicable. In this connection, qualified staff shall particularly look out for the irregularities listed under section 7 of the catalogue (**Annex 1**), column (3) of which contains cross-references in brackets to the relevant points of Volume 1 of the Loading Guidelines. Qualified staff shall also watch out for other visible signs that the load or load securing equipment is compromising operating safety and shall take appropriate action.
- 3.2.3 To help locate irregularities and defects, qualified staff shall use stick-on labels (see specimens in **Annex 11**) and shall, in written correspondence, quote the code number specified in column (2) of **Annex 1**.
- 3.2.4 This appendix is not an exhaustive catalogue 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.
- 3.2.5 The expression "Detach wagon" means that the wagon may not continue its onward conveyance if it presents an irregularity that could impact on the safety of operations.
- 3.2.6 Once detached, the wagon remains in the custody of the user RU which recorded the irregularity whilst the irregularity is being rectified.
- ...
- 3.2.8 All of the irregularities and defects identified in service (based on dimensional deviations in length, depth or width) are to be measured in millimetres (mm). Values of more than 0 mm and less than 1 mm do not need to be detected, but not measured.

4. Reason:

The introduction of a definition will clarify how the measurements are to be carried out for all parties involved.

5. Assess potential positive/negative impacts

Assess the possible positive and negative impacts (operations, costs, administration, interoperability, safety, competitiveness, etc.), using a scale from 1 (very low) to 5 (very high): Justify observations

Impacts:

Operations, interoperability, competitiveness, cost, management (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).

Risk analysis conducted by:

6.1. Does the change have an impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: The proposal clarifies the exchange of information between RUs and keepers	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: see template. Attach the "significant change" test template.	
6.3. Determining and classifying risk:	<input checked="" type="checkbox"/> 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: <input type="checkbox"/> No <input type="checkbox"/> Yes (describe possible misuse):	
6.4. Have safety measures been applied?	<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"> • <i>Code of practice</i> • <i>Use of reference system</i> • <i>Explicit risk assessment</i> 	
6.5. Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body: Attach the verdict reached by the assessment body:	[Appendix]