

## Proposed amendment to GCU Appendix 9

### Background

Amended by	Date	Paragraph	Amendment
Stefan Zebracki	16/01/2024	Basic text - 3.2.1	Drafting in accordance with minutes of TTI WG 01/2024
TTI WG decision	16/01/2024	Basic text - 3.2.1	Validation in accordance with minutes of TTI WG 01/2024
WU SG decision	14/05/2024	Basic text - 3.2.1	Approved by WU SG
GCU JC decision	04/06/2024	Basic text - 3.2.1	Rejected
TTI WG decision	19/03/2025	Basic text - 3.2.1	Validation in accordance with minutes of TTI WG 03/2025
Feedback loop WG MNT after UIC WU SG, UIP and ERFA meetings	16/05/2025	Basic text - 3.2.1	No changes reported, approved by all
GCU JC decision	12/06/2025	Basic text - 3.2.1	Approved by the GCU JC

<b>Title</b>	Addition to the basic text of 3.2.1 – when in doubt: operate, pull or move
<b>Proposed amendment made by: RU/keeper/other</b>	TTI WG, 17/01/2024, drafted by S. Zebracki, DB Cargo AG
<b>Proposed amendment concerns:</b>	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
<b>Proposer:</b>	TTI WG, DB Cargo AG
<b>Location, date:</b>	Mainz, 26/02/2024
<b>Concise description:</b>	The control criteria are given in Annex 5 of Appendix 9. It should be specified in the basic text that the component should only be operated or pulled/moved in cases of doubt.

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

The control criteria are given in Annex 5 of Appendix 9. The following control criteria can be given as: VC = visual check; M = measurement; HT = hammer test; OP = operate; PM = pull or move the components.

Components should only be operated or pulled/moved in cases of doubt. In principle, all checks are visual.

**1.2. Mode of operation**

The following control criteria can be given as: VC = visual check; M = measurement; HT = hammer test; OP = operate; PM = pull or move the components

**1.3. Anomaly/description of problem**

It is to be specified that, in principle, a check is carried out visually. An operating test or a check by actuating the part in question is only carried out if a damage or defect is suspected, even if "operate" or "move" are given as control criteria in Annex 5.

**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 EC 402/2013, 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 (goal)**

The basic text should specify when a component is to be operated or pulled/moved. This clarification needs to be given in the basic text of Appendix 9 under 3.2.1.

### 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 **only** be measured in cases of doubt. **A component must be operated (operating test) or pulled or moved (actuation of the part in question) in the event of a suspected damage or defect.**

#### 4. Reason:

It is to be specified that, in principle, a check is carried out visually. A component is to be operated or pulled/moved only in the event of a suspected damage or defect, even if “operating” or “pulling/moving” are defined as control criteria in Annex 5.

#### 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*

Dealing with the damage or defect in no way changes the current situation. This merely provides clarity.

Impacts:

Operations, interoperability, competitiveness, costs, administration (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:*

<b>6.1. Does the change have an impact on safety?</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
Justification: The proposal specifies the exchange of information between the RU and the keeper.	
<b>6.2. Is the change significant?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Justification: see template. Attach the "significant change" test template.	
<b>6.3. Determining and classifying risk:</b>	<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):	
<b>6.4. Have safety measures been applied?</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: <ul style="list-style-type: none"> <li>• Code of practice</li> <li>• Use of reference system</li> <li>• Explicit risk assessment</li> </ul>	
<b>6.5. Has a risk analysis been submitted to the assessment body?</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body: Attach the verdict reached by the assessment body:	[Appendix]