

Proposed amendment to the GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Philippe BERRIO	01/12/2025	Ann1, 7.5.2.2	Drafting
TTI WG decision	10-11/03/2026	Ann1, 7.5.2.2	Approved by TTI WG meeting of March 2026
Feedback loop TTI WG after UIC WU SG, UIP and ERFA meetings		Ann1, 7.5.2.2	No change reported, approved by all
GCU JC decision	23/06/2026	Ann1, 7.5.2.2	Approved by the GCU JC

Title	Deletion or clarification of the exception concerning the wording of irregularity code 7.5.2.2 "Specific components of ILU. Door not properly locked (not applicable to doors facing another load unit)"
Proposed amendment made by: RU/keeper/other	Hexafret
Proposed amendment to:	☒ Appendix 9 GCU ☐ Appendix 11 GCU
Proposer:	Philippe BERRIO
Location, date:	01/12/2025 in Hendaye (France)
Concise description:	Clarification or deletion of the exception for irregularity code 7.5.2.2

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

The exception concerning the wording of irregularity code 7.5.2.2 can be understood as going against safety.

This exception must be withdrawn or specified (empty container, risk of fouling the gauge, loss of load, etc.)

1.2. Mode of operation

Delete the exception for irregularity code 7.5.2.2.

1.3. Anomaly/description of problem

The exception can be understood in many ways and therefore as going against safety.

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)**

For irregularity code 7.5.2.2, in accordance with IRS 50592, 5.1, and the Loading Guidelines, Volume 2, Chapter 9, the exception must be specified or withdrawn.

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

Component	Code	Irregularities/Criteria/Notes	Action to be taken	Irregularity class
Specific components of ILU, in particular those used for horizontal or vertical transshipment	7.5.2.2	Door not properly locked (not applicable to doors facing another load unit) without any risk of loss of load or fouling the gauge if:	Rectify, if not possible, detach wagon	4

4. Reason:

See points 1.3 and 2.1.

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).

Reasoning behind amendment:

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).

Performance of risk analysis is unnecessary where only recognised standards are implemented.

Risk analysis conducted by: Not applicable

6.1. Does the change have an impact on safety?	☒ No ☐ Yes
Reason:	
6.2. Is the change significant?	☒ No ☐ Yes
Reason: 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
<i>For each type of risk, one of the following risk acceptance criteria is to be selected:</i> <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?	☒ No ☐ Yes
Assessment body: Attach the verdict reached by the assessment body:	