

Proposed amendment to to the GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Philippe BERRIO	01/01/2026	App9, Ann11, Label M	Drafting
TTI WG decision	10-11/03/2026	App9, Ann11, Label M	Updated and approved by TTI WG meeting of March 2026
Feedback loop TTI WG after UIC WU SG, UIP and ERFA meetings		App9, Ann11, Label M	No change reported, approved by all
GCU JC decision	23/06/2026	App9, Ann11, Label M	Approved by the GCU JC

Title	Label M
Proposed amendment made by: RU/keeper/other	Hexafret
Proposed amendment to:	☒ Appendix 9 GCU ☐ Appendix 11 GCU
Proposer:	Philippe BERRIO
Location, date:	26/05/2026, Hendaye (France)
Concise description:	Clarifications to the text below the label M

1. Starting point (current situation):

1.1. Introduction
The description of label M, as it currently appears in the GCU, was taken from the RIV. The former provisions of the RIV do not take account of the current regulations.
1.2. Mode of operation
The definition of label M needs to be updated.
1.3. Anomaly/description of problem
At present, the M label requires RUs using it to carry out a specific inspection, which they are in most cases unable to do.
1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?
☐ No ☒ Yes (state which): Appendix 9 GCU. * "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 proposed solution enables the monitoring of damage and irregularities in order to prevent further damage and irregularities and ensure a high level of safety.

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

Label M is used to record wagon damage and ~~defects~~ **irregularities** that do not prevent the ~~vehicle~~ **wagon** from continuing to run ~~or~~ **and** being reloaded. ~~; but which require particular examination by the user RUs.~~

4. Reason:

See points 1.1, 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:	