

Proposed amendment to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Claude Weis	29/01/2019		Drafted as per TTI WG meeting of Oct 2018, Paris
Jean-Marc Blondé	20/03/2019		Amended following TTI WG meeting of March 2019
Approved by TTI WG	20/03/2019		As per TTI WG, March 2019
Approved by WU SG	22/05/2019		As per minutes of WU SG meeting

Title:	Amendment of code 6.5.2.5 - tank test deadlines on tank wagons
Proposed amendment made by: RU / Keeper / other body:	Developed by CFL Cargo
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Claude Weis, CFL Cargo
Location, date:	Dudelange, 29/01/2019
Concise description:	Code 6.5.2.5 must be altered as it is not consistent with RID 2019.

1. Starting point (current situation)

1.1. Introduction

The procedure for tank test deadlines that have expired ≤ 3 months with “L” marking is currently worded incorrectly in code 6.5.2.5 in Appendix 9, Annex 1 in terms of conformity with the RID.

1.2. Mode of operation

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1.3. Anomaly/Description of problem

In RID 4.3.2.3.7, carriage of wagons is permissible for a maximum of one additional month following expiry of the deadline for the indicated periodic inspection (no additional “L”), as long as they have been loaded prior to expiry of the deadline.

1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?

No Yes (state which): RID

* Code of practice: a written set of rules that, when correctly applied, can be used to control one or more specific hazards. (Source: Regulation [EC] No. 352/2009, Article 3 section 19).

“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.” (translation/source: German Ministry of Justice: Handbuch der Rechtsförmlichkeit, recital 255)

2. Target situation (goal)

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3. Amendment proposal

Colour code for changes:

BLACK:..... actual text, for info and remains unchanged

RED: added or modified text

BLUE and struck out:..... text will be deleted

Component	Code no.	Irregularities/Criteria/Notes	Action to be taken	Category
Tank	6.5.2			
	6.5.2.1	Not tight: leaks or risk of loss of load	Have sealed + K. If not possible, detach wagon	5
	6.5.2.2	Distorted with sharp edges but no risk of loss of load	K	4
	6.5.2.3	Tank test date expired for shipment of RID goods WITHOUT "L" marking – Tank full, ≤ 1 month	K	5
	6.5.2.4	> 1 month	Detach wagon	5
	6.5.2.5	– Tank empty, not cleaned • < 1 month • > 1 month	K	5
	6.5.2.6	Tank test date expired for shipment of RID goods WITH "L" marking – Tank full, > 3 months	Detach wagon	5
6.5.2.7	– Tank empty, not cleaned > 3 months	K	5	

4. Reason

In RID 4.3.2.3.7, wagons that do not have an “L” marked after the tank inspection date and that have been loaded prior to this date can be transported for a maximum of one month following expiry of this deadline.

5. Assess potential positive/negative impacts

*E.g. on operations, costs, administration, interoperability, safety, competitiveness, etc., using a scale of 1 (very low) to 5 (very high).
Justify observations*

Impacts:

Operations, Interoperability, Competitiveness, Costs, Administration (value: 3)
 - The change ensures that the change to 4.3.2.3.7 in RID 2017 is respected

Safety (value: 4)

– The change ensures that wagons are handled correctly in accordance with RID 2017 and Appendix 9 to the GCU

6. Safety appraisal of proposed amendment

Description of actual/target system, and scope of change to be made (see points 1 and 2).

Safety study conducted by:

6.1. Does the change make impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
6.3. Determining and classifying risk	<input checked="" type="checkbox"/> not applicable
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 type="checkbox"/> No <input checked="" type="checkbox"/> Yes
<p><i>For each type of risk, one of the following risk acceptance criteria is to be selected:</i></p> <ul style="list-style-type: none"> • <i>“Code of practice” (acknowledged technical rules)</i> • <i>Use of reference system</i> • <i>Explicit risk estimate</i> 	
6.5. Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
<p>Assessment body: Attach the verdict reached by the assessment body</p>	[appendix]