Proposed amendment to
GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Lukas Halbig	03/03/2020		Draft
TTI WG decision	24/03/2020		See minutes of TTI WG meeting of March 2020
Approved by SG WU	26/05/2020		See minutes of WU SG meeting of May 2020
Approved by JC GCU	15/06/2020		

Title:	Detection of hidden damage/damage difficult to see Wykrywanie ukrytych uszkodzeń / uszkodzeń trudnych do zauważenia
Proposed amendment made by: **RU / keeper / other body**	DB Cargo
Proposed amendment concerns:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Sven Seligmann
Location, date:	Mainz, 02/09/2019
Concise description:	Detection of hidden damage/damage difficult to see

1. Starting point (current situation):

1.1. Introduction

Damage and irregularities are identified with the aid of the labels provided in Appendix 9, Annex 11. Uszkodzenia i nieprawidłowości identyfikuje się za pomocą etykiet podanych w dodatku 9, załącznik 11.

1.2. Mode of operation

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1.3. Anomaly / description of problem

Despite the detailed descriptions shown on the labels, it is difficult for inspection and maintenance personnel to identify damage and irregularities on the wagon that have already been detected by other personnel in order to continue their inspections.

Pomimo szczegółowych opisów przedstawionych na etykietach personel inspekcyjny i konserwacyjny ma trudności z identyfikacją uszkodzeń i nieprawidłowości w wagonie, które zostały już wykryte przez innych pracowników w celu kontynuowania inspekcji.

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

☒No ☐ Yes

* "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 352/2009, 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" (translation/source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

Introduction of the following text:
"As a complement to the traceability provided by the labels, visible damage must be marked in crayon". Wprowadzenie następującego tekstu:
„Jako uzupełnienie identyfikowalności zapewnianej przez etykiety widoczne uszkodzenia należy oznaczyć kredką".

3. Additional text and/or change relates only to proposed amendments to GCU Appendix 9:

Amendment colour code:

Black: Current text, for info and remains un-changed
Red: new text
Blue: (if crossed out): text to be deleted

Annex 11

I, K, M, R1 and U labels – General
The labels mentioned in Annexes 1 and 8 (I, K, M, R1 and U) must be printed in either French, German or Italian. Translations into other languages can be attached. When used, they must always be filled out completely.
As a complement to the traceability provided by the labels, visible damage must be marked in crayon. Jako uzupełnienie identyfikowalności zapewnianej przez etykiety widoczne uszkodzenia należy oznaczyć kredką.

4. Reason:

Oznaczanie ukrytych uszkodzeń i szkód, które są trudne do zauważenia, umożliwi szybszą i bardziej wydajną ocenę zidentyfikowanych szkód i nieprawidłowości.

Marking hidden damage and damage that is difficult to see will enable more rapid and more efficient appraisals of damage and irregularities that have already been identified.

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: 4
Interoperability: 1
Competitiveness: 1
Costs: 2 (exorbitant maintenance costs in the event of an overly severe assessment of damages)
Administration: 4
Safety: 1

6. Safety appraisal of proposed amendment

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

The risk study becomes obsolete insofar as only the known repositories are implemented

Safety study conducted by:

6.1. Does the change made impact on safety?	☒No ☐ Yes
Reason: The damage is already documented and pinpointed using damage labels with the associated descriptions of damage. Labelling enables identification of damage that has already been detected in order to facilitate a more in-depth assessment.	
6.2. Is the change significant?	☒ No
Reason: level of innovation: low. Marking in crayon is already used for other things. Level of complexity: low. Few interfaces with other subsystems and persons concerned. Consequences of failure: minor. Defects are currently marked in crayon. Marking allows the damage detected to be located. Monitoring: high level of monitoring via the quality management system in the GCU. Reversibility: reversible. The request to provide markings can be withdrawn.	
6.3. Determining and classifying risk:	☒ deleted
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
For each type of risk, one of the following risk acceptance criteria is to be selected: • *"Code of practice"* (acknowledged technical rules) • *Use of reference system* • *Explicit risk estimate*	
6.5. Has a risk analysis been submitted to the assessment body?	☒No ☐ Yes
Assessment body: Attach the verdict reached by the assessment body:	[appendix]