Proposed amendment to GCU Appendix 9

Amendment history

Amended by	Date	Paragraph	Amendment
Claude Weis	2/2/2018		Filed in accordance with the TTI WG meeting held in Paris, February 2018
TTI WG decision	21/3/2018		See minutes of TTI WG meeting of March 2018
WU SG decision	29/5/2018		See minutes of WU SG meeting of May 2018

Title	Amendments to codes 6.5.2.3 and 6.5.2.4 - test date for tank wagons
Proposed amendment concerns RU/keeper/other:	CFL Cargo
Proposed amendment concerns:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Claude Weis, CFL Cargo
Location, date:	Düdelingen, 02/02/2018
Concise description:	Amendments to codes 6.5.2.3 and 6.5.2.4 are necessary since the RID 2017 has evolved as far as test dates are concerned (4.3.2.3.7).

1. Starting point (current situation):

1.1. Introduction

Currently codes 6.5.2.3 and 6.5.2.4 of Annex 1 of Appendix 9 describe the procedure to follow in case of test date expiration for tank wagons. Given that point 4.3.2.3.7 of the RID has been modified, codes 6.5.2.3 and 6.5.2.4 must be amended accordingly.

1.2. Mode of operation

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1.3. Anomaly/description of problem

Point 4.3.2.3.7 of the RID permits the continued carriage of tank wagons marked with an “L” beside the tank testing date and which have been loaded before this date, up to a maximum period of one month after expiry of the deadline for testing or inspection.

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

☐No ☒ Yes (state which): RID 2017

* “a written set of rules that, when correctly applied, can be used to control one or more specific hazards." (Source: Regulation (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". (Source: BMJ Handbuch der Rechtsförmlichkeit – guide published by German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

Amendments to codes 6.5.2.3 and 6.5.2.4, see point 3.

3. Additional text and/or modifications (relates 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 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 – tank full, ~~may be extended by 3 months if marked "L"~~ without "L" marking ≤ 1 month	~~Detach wagon~~ K	5
	6.5.2.4	– tank full ~~empty may be extended by 3 months if marked "L"~~ > 1 month or > 3 months if marked "L"	~~K~~ Detach wagon	5
	6.5.2.5	Tank empty not cleaned: < 1 month < 3 months if marked "L"	K	5

4. Reason:

The point 4.3.2.3.7 of the RID permits the continued carriage of tank wagons marked with an "L" beside the tank testing date and which have been loaded before this date, up to a maximum period of one month after expiry of the deadline for testing or inspection.

5. Assess potential positive/negative impacts

Assess the possible positive and negative effects (operations, costs, administration, interoperability, safety, competition, etc.) on a scale of 1 (very low) to 5 (very high):

Impacts:
Operations, Interoperability, Competitiveness, Cost, Management: Value 3
- This amendment considers the modification of RID 2017 point 4.3.2.3.7.

Safety: Value 4
- This amendment ensures that wagons are correctly handled about 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).

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

Risk analysis realised by:

6.1 Does the change have 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 Determining and classifying risk	☐No ☒ Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: • *Code of practice* • *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]