

WAGON USERS Study Group

Proposed amendment to GCU Appendix 9

Amendments

Amendment made by	Date	Paragraph	Amendment
Stefan Zebracki	25/1/2017		Drafted
Stefan Zebracki	1/2/2017		Included outcome of TTI WG meeting on 1.2.2017
Decision of WG TI	31/3/2017		See minutes of TTI WG meeting of March 2017

Title	QMS - main text, points 1.2 and 4.4
Proposed amendment made by (RU / keeper / other body):	Executive Committee of the UIC ATTI Special Group
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Stefan Zebracki – Technical Wagon Dept.
Location, date:	Mainz, 25.1.2017
Concise description:	Adapt the wording of points 1.2 and 4.4, "Planning of tests". In the context of multilateral RU-RU relations and the further enhancement of the QMS, the wording of Appendix 9, points 1.2 and 4.4 (main text on QMS) needs to be revised.

1. Starting-point (current situation):

1.1. Introduction

The aim of the Quality Management System set out in GCU Appendix 9, point 4 is to obtain a representative sample in accordance with DIN 2859. In this context, an inspection plan containing an annual target batch per RU is drawn up in accordance with point 4.4. The number of wagons to be inspected per year is determined on the basis of the total number of wagons handed over in a given year.

In addition, a Quality Assurance process between RUs is also required for wagons exchanged under the terms of an agreement.

1.2. Mode of operation

The basis for determining the value is DIN ISO 2859-1.

1.3. Anomaly / description of problem

As part of multilateral RU-RU relations, wagons inspected by one RU are transferred by this RU to various other RUs. This "overall batch" can be made up of partial batches. Random sample testing is conducted by the receiving RUs.

The wording of point 4.4, "Planning of tests" should be amended to indicate that the overall batch is to be determined on the basis of all the partial batches / all the wagons handed over by an RU. For the avoidance of doubt, the following sentence should be reworded as per point 3 of this proposal:

"This overall batch includes all wagons handed over by one RU to another RU (including via one or more transit RUs) in a given calendar year."

In addition, in the context of multilateral agreements it is important that a Quality Assurance process is applied between RUs for wagons exchanged under the terms of an agreement. There is no single "one-size-fits-all" Quality Assurance process. Moreover, the binding nature of the process chosen is to be laid down in the agreement in question; no parallel rule in Appendix 9 is therefore required. The wording of point 1.2 should be revised as per point 3 of this proposal.

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

No Yes (state which): DIN ISO 2859-1

* "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" (Source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation**2.1. Elimination of anomaly/problem (goal)**

The wording of points 4.4, "Planning of tests" and 1.2 should be amended (see point 3 of this proposal).

3. Additional text (relates only to proposed amendments to GCU Appendix 9):

We ask that points 4.4, "Planning of tests" and 1.2 be reworded as follows:

1.2 It ~~also~~ describes (in point 4 and Annexes 5, 6 and 7) ~~the~~ a quality assurance procedure to be applied by RUs that have signed agreements governing the technical conditions for the exchange of freight wagons. ~~Where this is the case, the quality management system constitutes a legally binding part of such agreements.~~

4.4 Planning of tests

The number of wagons to be inspected, referred to as the "inspection batch", shall be determined from the "overall batch", which includes all wagons handed over by one RU to another RUs (including via one or more transit RUs) in a given calendar year. The overall batch may be divided into partial batches, for example according to specific routes or handover points. From this overall batch (or corresponding partial batches) is determined an "inspection batch", as specified in ISO standard 2859 (Annex 3) which is then incorporated into the annual inspection schedule as a theoretical inspection batch. When dividing up into partial inspection batches defined on a monthly basis, account should be taken where possible of annual trends in the changing number of wagons.

When determining the inspection batch, inspection level II should be applied.

4. Reasoning:

As part of multilateral RU-RU relations, wagons inspected by one RU are transferred by this RU to various other RUs. This "overall batch" can be made up of partial batches. Random sample testing is conducted by the receiving RUs.

The wording of point 4.4, "Planning of tests" should be amended to indicate that the overall batch is to be determined on the basis of all the partial batches / all the wagons handed over by an RU. The amendment is needed to ensure unambiguous understanding.

In addition, in the context of multilateral agreements it is important that a Quality Assurance process is applied between RUs for wagons exchanged under the terms of an agreement. There is no single "one-size-fits-all" Quality Assurance process. Moreover, the binding nature of the process chosen is to be laid down in the agreement in question; no parallel rule in Appendix 9 is therefore required. The wording of point 1.2 should be revised as per point 3 of this proposal.

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).

Justify observations

Operations, Administration, Safety, Costs, Competitiveness: (value: 2)

Interoperability: 5

The amendment will have a very significant impact on interoperability, since it makes allowance for multilateral agreements in the QMS.

6. Safety appraisal of proposed amendment

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

Safety appraisal performed by: not needed, since adaptation results from the aforementioned standards.

6.1. Does the change made impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reasoning: Random sample testing as per DIN ISO 2859-1 will continue, enabling a quality statement for each RU.	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reasoning:	
6.3. Determining and classifying risk:	<input checked="" type="checkbox"/> 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: <input type="checkbox"/> No <input type="checkbox"/> Yes (describe possible misuse):	
6.4. Have safety measures been applied?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: <ul style="list-style-type: none"> • Code of practice • Use of reference system • Explicit risk estimate 	
6.5. Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body: Attach the verdict reached by the assessment body:	[Appendix]