

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBahnVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

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**RID: 44th Session of the Committee of Experts on the Transport of Dangerous Goods
(Zagreb, 19 - 23 November 2007)**

Subject: Special provision TE 22

**Comments from the International Union of Private Wagons (UIP) on documents OTIF/
RID/CE/2007/12 (Germany) and OTIF/RID/CE/2007/7 (France)**

The actual introduction of crash buffers has unfortunately turned out to be much more difficult than the members of the RID Committee of Experts assumed it would be when the decision was taken in November 2003 in Sinaia.

Approval authorities struggled for a long time to get clarification of the questions addressed in Germany's proposal. The clarification obtained is still not considered to be generally recognized. In addition, with regard to the issuing of approvals for components, the entry into force of the TSIs gave rise to an approvals vacuum. Buffer manufacturers no longer wanted to deal with individual state approval procedures, UIC was no longer working actively on the UIC leaflets, as they are being replaced by European standards, and a draft standard on buffers (prEN 15551) has therefore been available for a short time which also includes crash buffers. Work is also being carried out on the design standard for vehicle bodies (EN 12663), which is also supposed to include stresses arising from the use of crash elements.

In this situation, UIP fully supports the important clarifications in the German proposal. Adopting these clarifications would also be helpful for the standardization work mentioned above. However, if the German proposal is adopted, a transitional provision must be introduced. This transitional provision must allow all crash buffers which are already fitted and which do not meet the modified requirements (especially approval on the basis of standard EN 15551) to be able to continue in use indefinitely.

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But the problems described and the time delays have also considerably delayed the start of retrofitting among members of the UIP. UIP therefore supports the French proposal and requests that the date for retrofitting be postponed by at least two more years to 1 January 2013. In connection with this, UIP refers to its initial comment: "As far as we are aware, no buffers are currently approved throughout the whole of Europe for the unrestricted retrofitting of existing wagons."

UIP also requests the RID Committee of Experts to make clear that for gas tank-wagons, which from around 1980 were generally fitted with category C buffers in accordance with UIC leaflet 573, retrofitting with category AX buffers (A buffers with crash elements) is sufficient, provided there were no special technical reasons related to the wagon for fitting C buffers. This has been confirmed in various meetings (including the RID Committee of Experts), but unfortunately is not to be found stated clearly in any minutes.
