

ANSF POSITION ON SUBJECTS OF THE AGENDA OF THE FOLLOWING MEETINGS:

**13TH MEETING OF THE WORKING GROUP ON TANK AND VEHICLE TECHNOLOGY
(Rome, 11-12 April 2012)**

**MEETING OF THE WORKING GROUP ON SAFETY OBLIGATIONS OF PARTICIPANTS
(Rome, 12-13 April 2012)**

2. Detection of derailments

Objective of this Working Group is to make an assessment of the European Commission Decision on the derailment detection device. ANSF has already sent comments on the study to the ERA and to the Ministry of Infrastructure and Transport carried out by DNV on this device. At the last RISC, which was also attended by the Agency with the Ministry of Infrastructure and Transport, the same observations made by ANSF have been remarked again.

The European Commission during the last RISC announced that a position will be sent to OTIF to recommend the use of the DNV study results and measures proposed by the Report of the ERA.

For ANSF the application of the derailment detection device is a possible solution to detect in time the derailment of trains, but It must consider the evidence uncovered in the study DNV, related to that device, and carefully consider the various scenarios that could be created following the intervention of such a device (see comments on the results of the study DNV exposed during the last session of the Working Group "Technical and Rolling Stock Tanks", read the document OTIF/RID/CE/GT/2011-A paragraphs 6 to 20, all seeking the best solution to adopt in terms of costs / benefits). Further the alternative measures identified by the study DNV have to be considered for the prevention and mitigation of the derailments of freight trains.

3. Accident reports

Regarding this point ANSF has nothing to add, It is still waiting for the results of the Italian Investigation Body concerning the incident of Viareggio, and their recommendations.

4. Handbrakes on new build tank-wagons and other dangerous goods wagons

Regarding the handbrake, the Agency considers important, before taking a position, to wait for the UIP report on the necessity, especially for new dangerous goods wagons, to have the hand brake that can be handled from the platform / gangway.

We state here that the current text of the wagons TSI does not require all wagons to have the handbrake. In case this was present TSI provides that compliance with certain requirements including that the handbrake must be accessible and operable from the ground as well as on the vehicle. The new version of the TSI has maintained the principle of non-mandatory presence of the hand brake on all the wagons but, among the requirements that must be respected at presence of the hand brake, there isn't added the requirement of accessibility and operable from the ground or on the vehicle.

According to this, It is considered advisable for the mandatory hand brake on the wagon especially those transporting dangerous goods and in this spirit, the ANSF, under the ERA Working Group on the revision of the TSI wagon, pointed out this problem and has requested an opinion of the ERA.

5. Transitional provisions for old gas tank-wagons

The debate focuses on whether or not to review the transitional arrangements for the continued operation of old gas tank-wagons with age greater than 30 years.

It is considered that a tank-wagon properly maintained and in good standing with the maintenance revisions can provide adequate security and good working, well over thirty years of service, however, suspected that the parts subject to fatigue as axles, axle-bearings, springs or laminated suspension springs after a reasonable period of time that can be set at 32 years being a multiple of the frequency of maintenance inspections should be replaced while keeping the elements subjected to static actions prior radiographs to 200 mesh.

6. Carriage in bulk

The argument concerns amendments to the provisions of the special series BK, VW and VV of chapter 7 of RID 2011, regulating the transport of goods in bulk in tanks and containers.

The formulations will be discussed in the joint meeting of Bern 19 to 23 March 2012. So pending the outcome of the meeting in Berne ANSF has no position on it.

7. Entity in Charge of Maintenance (ECM)

It expresses' agreement with the assessments made by the group on the consistency between the European Regulation. 445/2011 and the RID for maintenance of dangerous goods freight wagons, given that the certification of the ECM provides a special section dedicated to the dangerous goods. Because the regulations are more detailed than the RID ANSF agrees that in the new RID there is a reference to Regulation no. 445/2011 for details (subsections 1.4.3.4 and 1.4.3.5 of the RID).