

**Consultation on Rail Industry Standard
To be returned by 27/05/2021**



Please pass the attached document and questionnaire to people with the appropriate competence and authority within your company for review / comment.

Please ensure that this questionnaire and all comments (including 'Not applicable') are returned to arrive at the address shown on or before 27/05/2021

Doc No: RIS-2700-RST

Issue: N/A

Draft: N/A

Document Title: Rail Industry Standard for verification of conformity of engineering change to rail vehicles

CONSULTATION QUESTIONNAIRE

Should the Rolling Stock Standards Committee approve the publication of this document?

Please tick box one option from the list below

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | I am not representing the view of any organisation and have the following comments |
| <input type="checkbox"/> | My organisation has no comments or suggested amendments and supports the Standards Committee approval of the publication of this document |
| <input checked="" type="checkbox"/> | My organisation supports the Standards Committee approval of the publication of this document subject to the comments / suggestions being considered |
| <input type="checkbox"/> | My organisation does not support the Standards Committee approval of the publication of this document as a matter of principle for the reasons stated |
| <input type="checkbox"/> | The content of this document is not applicable to my organisation |

Would all individuals returning this form please provide the following information:

Name and, if applicable, job title: Steve Taylor, General Manager, Rail Wagon Association

Email address: steve@railwagon.org

Date: 24 May 2021

Email your response to: consultation@rssb.co.uk

Use a separate box for each comment / add boxes or pages as necessary

Page	Section	Comments	Proposed revised text
The Rail Wagon Association represents the interests of owners, keepers, users, designers, manufacturers, hirers, ECMs, consultants, maintainers and operators involved in rail freight wagons based in the UK. We welcome the opportunity to comment on the usefulness and content of RIS-2700-RST.			
7	1.1.3 1.1.4	We believe that a casual reading of these paragraphs would lead to the conclusion that the document only applies to OTMs and heritage vehicles.	Add 'also' to 1.1.4 to read '...set out in this document is also relevant to ...' Expansion of the circumstances surrounding the 'falls outside' of the scope of RIR may also be useful.
9	2.1.2	ECM certification under Regulation (EU) 2019/779 is also permitted for ECMs operating on the GB mainline	Add 'or in accordance with Regulation (EU) 2019/779.'
11	Table 1	Ignores the role of the ECM in the release of vehicles back into service	Table needs a reformat or a sub-clause
12	2.2.12	Ignores the role of the ECM	Add 'ECM' to list of manufacturer or keeper
16	3.1.1(a)	Clarification needed of 'different' - to whom?	Different company to the Proposer
16	3.2.1.1	Rewrite to aid understanding is suggested	An assessment body with an appropriate level of independence shall be...
18	3.2.3.7 And others such as D.6.1	All references to RU in the document should be reviewed to see whether 'RU or ECM' needs to be added. Similarly references to RU SMS may need expanding to include ECM Certification	

Page	Section	Comments	Proposed revised text
18	3.2.3.9	Typo last para, second line	verifiers
18	3.2.4.3	Typo 'and is and is'	...and is
20	Figure 2 And other figures	references to RU should be reviewed to see whether RU or ECM needs to be added.	
24	4.1.2.4 4.1.2.5	These paragraphs would benefit from rewriting to clarify the different concepts introduced	
30	4.3.1.8c	Reference to TSI should be NTSN	NTSN
31	4.3.2.3a	It says that a change can be initiated for two reasons, but the use of AND makes this one reason.	Suggest it should be OR
43	6.2.4	Interesting maybe but 'so what?' Engineering change certificates are no longer relevant and probably not used anymore. Rolling stock library has been replaced by R2	Delete para
44	6.3.4	Suggest the ECM would definitely be interested, not maybe?	
44	6.4.2	This is a very broad sweep! Should it not be limited to the Proposer or Approval body and only regarding the relevant engineering change. Investigated by whom?	

Page	Section	Comments	Proposed revised text
64	Appendix F2	<p>Not sure why an example of a Certificate of Verification is given; although it maybe useful for those wanting a template to work from.</p> <p>However, the document has no references to a Certificate of Verification other than in the index and the example in Appendix F2. Consequently, its inclusion adds potential confusion with the Attestation Statement.</p> <p>If it is to be retained, then we suggest that suitable text explaining its use and relevance should be added to the main body of the RIS.</p>	

Rail Safety and Standards Board Limited will use the information you supply on this form to collate and respond to consultation comments. We will disclose your information to our members, service providers, agents and others who have commented for this purpose. Additionally, we will publish this information on our website (www.consultation.rssb.co.uk) unless you expressly request your name and job title remain confidential.