

2023/24 NTSN revisions – consultation questionnaire

Please return this questionnaire to consultation@rssb.co.uk by **11 December 2023**.

Please read the supporting information on the consultation letter and pass this consultation to relevant people within your organisation for review and comment.

1. Your information

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Are you representing the views of any organisation?	Y If so, please confirm which organisation: Rail Wagon Association

2. Your comments on the draft NTSN proposals

Please use a separate row for each comment and add rows as necessary.

Please provide evidence where possible to support your comments and suggestions.

No	NTSN	Page	Clause	Comment	Suggestion
1	WAG	20	4.2.3.5.3.2	Derailment Detection. As these clauses are not mandatory they seem acceptable but may have unintended consequences. A system which detects a precursor to a derailment and corrects it on the wagon (eg wheel slide prevention), but does not send a signal to the driver, maybe a cost effective solution as it avoids the need for jumper cables, wifi or cloud connections. These clauses would seem to prohibit such a system.	Add wording such as shown in red below: The DPF shall send a signal to the driver's cab of the locomotive hauling the train once a precursor to derailment is detected in the unit unless it can correct the issue without so doing.

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2	WAG	58	7.1.2	We consider that the wording intended to help ascertain whether a service is international or domestic still does not cover all situations. For example, an international service which stops in the UK to unload some of its wagons before continuing to its final destination would seem to be classed as international only until that first stop. The remainder of the journey would presumably be classed as domestic.	The Mirror Group should consider how this can best be addressed – through more words in the NTSN or through guidance. Such words may use the purpose of the vehicles journey rather than the train service. For example words to the effect of the vehicle is considered to be international from where it is loaded in one country and unloaded in the UK. If subsequently loaded in the UK for unload in the UK this journey would class the vehicle as on domestic duty.
3	WAG (& NOISE)	61	7.2.3.1	Transition Regime arrangements for NTSNs and Railway Group Standards may need to be aligned	The application of RGSs should be set out in the Guidance Notes to ensure the same flexibility as introduced by the NTSN is available. This should clarify which RGSs are applicable at the design and production phases. This may need a ‘generic’ and ‘specific’ classification to be developed for RGS.
4	WAG	101	Appendix G	List of Composite Brake Blocks Brake Blocks	Appendix G needs to be updated with all composite brake blocks currently in use in GB. It is not easy to find it on the ORR website. Please check the following have been added: ABEX 229 ProBlock J821. TBL804 block is now called ProBlock 804 and is manufactured by Knorr-Bremse.

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5	NOI	28	Appendix D	<p>Quieter Route definition</p> <p>The new definition of a Quieter route is more flexible than before but could be subject to routes being designated as quiet for local interest group purposes. The requirement to publish justification is therefore important.</p> <p>The proposed wording does not have a requirement to review regularly whether a route designated as Quieter by the Competent Authority is still sensitive or whether noise mitigation measures such as barriers have been introduced. The wording does allow the list to be updated at any time but that is slightly different to a review to ensure that a designation is still valid.</p>	<p>The Mirror Group should consider whether the proposed wording needs more safeguards. Due to the welcome changes made in point 7.4.2 the new definition will not have immediate affects on freight movements.</p> <p>A requirement should be added for the Competent Authority to review the list of Quieter Routes at certain intervals.</p>
6	WAG	3 and following	Article 8	<p>Article 8 has caused some confusion in the past.</p> <p>The first paragraph of Article 8 in the new NTSN appears to render much of what follows invalid as the NTSN will not enter into force before 1st January 2024, namely:-</p> <ol style="list-style-type: none"> 1. A UK certificate of verification for a subsystem that contains interoperability constituents which do not have an EC or UK declaration of conformity or suitability for use may be issued during a transition period ending on 1 January 2024, provided the provisions set out in Section 6.3 of the Annex are met. 	<p>Mirror Group should consider whether it is possible to simplify Article 8 to aid reading and understanding in the post 1st January 2024 context</p>
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RSSB will use the information 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 the consultations website (www.consultations.rssb.co.uk) unless you expressly request your name and job title remain confidential.