

Consultation comments and responses

Document Title: Guidance on Designing Rail Freight Wagons for use on the GB Mainline Railway

Document number: GMGN2688, issue three

Consultation closing date: 18th December 2023

1. Responders to consultation

No	Name	Company
1	David Warwick	Network Rail
2	David Smith	Gemini rail services
3	David Morris	Lundy Projects
4	Aneta Crabtree	Angel Trains
5	Keith Mack	LNER
6	Sue Perry	Great Western Railway
7	Andy Nicholas	Knorr Bremse Rail Systems UK
8	Steve Taylor	Rail Wagon Association
9	Rolling Stock Standards Committee	N/A
10	Jennifer Houghton / Nicholas Powell	Colas Rail

2. Summary of comments

Code	Description	Total
-	Consulted	442
CE	Critical errors	1
ED	Editorial errors	0
TY	Typographical errors	0
OB	Observations	3
-	Total comments returned	4

Classification codes for a way forward:

- DC – Document change
- NC – No change

3. Collated consultation comments and responses

No	Page	Clause	Comment	Suggestion	By	Way forward	Page	Clause	Response
1	All	All	Although the whole document has been revised, some content has been materially changed but some has only been redrafted to say the same as issue 2 but in accordance with current style requirements.	Please indicate with a black vertical line those sections which have been materially changed.	9	DC	All	All	Sections which have been materially changed during the revision have been indicated by a black line. The text in the 'Issue record' section has been amended to read: <i>'This document has been extensively amended. Only revisions that have been deemed as significant have been indicated with a vertical black line.'</i>

2	47	Fig 4	<p>We have modified the reference list of approved brake blocks from GM/GN2688 by adding extra columns. These are indicated in blue text. These show the current name for blocks supplied by KB, plus some comments on the sizes available, which references the attached spread sheet. Please note the following explanation of the situation with KB blocks:-</p> <ul style="list-style-type: none"> All Jurid and Ferodo blocks in this list: KB owns the intellectual property of all these products; Jurid and Ferodo still sell their own products under KB License. For selected products, KB integrated equivalents in their own production (e.g.; Ferodo 3204F, also available as ProPad 3204F; both available independently on market). However, from this list, we did not integrate any of the products; therefore they are only available as Jurid / Ferodo versions. Remark on Jurid 816: There are two similar blocks on the market: "Jurid 816" and "Jurid 816M". KB integrated the latter as "ProBlock J816M". Thus, if this list states "Jurid 816" correctly, we don't have an equivalent. We mention this because the (J)816M is a very popular freight block while the 816 is rare. For ProBlock 804UK and ProBlock 903UK, the suffix "UK" is essential as there are also KB blocks without this suffix from a different origin. ProBlock 804UK: When reviewing blocks sold from Manchester, we have far more geometries than the four listed. Interestingly, only the last of the listed four matches one of our geometries (840 mm with brake configuration 1-Bgu *). The attached file KB UK Freight Blocks_external.xlsx shows all our geometries. We suggest the RSSB revise the GM/GN2688 list accordingly. Although please note that it might be that not all of the blocks on our list are used in freight. ProBlock 903UK: In addition to a 920 mm block, there is a 600 mm version; see the 	Update Figure 4 accordingly	7	DC	47	Fig 4	<p>Figure 4 updated. Entries for TMD products TBL 804 and TBL 903 changed to Knorr Bremse ProBlock 804UK and ProBlock 903UK. Note beneath the table updated to include reference to TMD product names.</p> <p>No change to Jurid 816 as no indication has been received that the current listing is incorrect.</p> <p>No additional geometries for ProBlock 804UK or ProBlock 903UK added as no indication has been received that additional geometries are missing for freight applications.</p>
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			Excel file. Again, it might be that not all blocks listed are used in freight.						
3	47	Fig 4	<p>[Figure 4] needs to be updated with all composite brake blocks currently in use in GB.</p> <p>Please check the following have been added:</p> <p>ABEX 229</p> <p>ProBlock J821.</p> <p>TBL804 block is now called ProBlock 804 and is manufactured by Knorr-Bremse.</p> <p>[NOTE: comment was submitted against the draft WAG NTSN, but it was agreed to address via the consultation on GMGN2688]</p>	Update the Figure 4.	8	DC	47	Fig 4	<p>ABEX 229 was already listed, but an additional geometry for 840 mm diameter wheels has been added in line with correspondence with the NOI TSI/NTSN Mirror Group.</p> <p>Problock J821 has not been added, due to i) contradictory information received as to whether this should be correctly called Problock J821 or Jurid 821, and ii) no technical information has been provided to complete the rest of the columns of the table.</p> <p>TBL 804 – see response to comment 2, above.</p> <p>Additionally, Jurid 838 has been added, as advised to the NOI TSI/NTSN Mirror Group.</p>
4	73 - 83	Appendices B, C, D, E	<p>The content of these appendices does not seem to be consistent with requirements in RID, for example the statement in Appendix E2 (G E.2.1) on the Partial Filling of Tanks appears not to be correct. It seems to have overlooked the 80:20 rule, which has been part of RID, ADR and IMDG regulations for many years. The current version mistakenly considers RID is only applicable to international traffic! RID compliance on the GB Mainline Railway a legal requirement. The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009 both quotes RID and gives supplemental instructions to RID. The DGWG need to review this document in full</p>	Review the content of Appendices B, C, D & E with the Dangerous Goods Working Group	10	DC			<p>Review of the technical content of Appendices B – E was not part of the scope of the project and review of these with drafting review group did not identify a need to fully review these other than to make some minor changes to refer to updated standards etc. The appendices were also re-phrased in line with current drafting standards.</p> <p>Due to the nature of the concerns raised about the content of these appendices and consequently the time necessary to fully review these, in order to enable publication of the document the content of appendices B – E has been withdrawn from the current issue of the document. It is intended that a full review of their content will be performed when the document is next revised to align with the revised NTSNs (2024 versions). Appendices B-E now all state: <i>‘The content of this appendix has been withdrawn pending review. Guidance on the requirements set out in the Regulations concerning the International Carriage of Dangerous Goods by Rail (RID) can be obtained from a dangerous goods safety adviser.’</i></p>