

OPINION ERA/OPI/2012-08/INT
OF THE EUROPEAN RAILWAY AGENCY

of 02 August 2012

FOR

Ms Sian PROUT – DG MOVE B2

REGARDING

Question and clarification from NB-Rail on the minimum brake performance requirements for freight wagons with disc brakes in the CR TSI WAG 2006/861/EC (QC-RST-013)

1. General Context

1. In a note to Mr Jean-Charles PICHANT dated 30 May 2012 and referenced D (2012)643.673, Ms Sian PROUT (DG-MOVE B2) has requested the Agency to issue a technical opinion regarding a question and clarification (Q&C) by NB Rail (see Annex 1).
2. The technical scope of this technical opinion to the Q&C QC-013-RST relates to the clause 4.2.4.1.2.2 "Braking performance elements" of the CR WAG TSI (Commission Decision 2006/861/EC amended by 2009/107/EC).

2. Legal Background

1. Article 28(5) of Directive 2008/57/EC of the European Parliament and of the Council of June 2008 on the interoperability of the rail system within the Community¹ (Interoperability Directive).

"The Commission, when appropriate, will propose the measures needed to remedy the problems."

2. Section 2.3.4 of Framework mandate to the European Railway Agency adopted on 13 July 2007 – C(2007)3371.

"..the Agency shall analyse the issue raised by the Commission or by the Committee under the format I.Q (interpretative question, Q.C (questions / clarifications) or similar, and provide answers to them."

3. Analysis

1. The Q&C QC-RST-013 states that the table defining the minimum braking performance for brake modes "G" and "P" in clause 4.2.4.1.2.2 "braking performance elements" distinguishes between "Case A – Brake only on wheels (Brake blocks)" and "Case B – Other cases" e.g. disk brakes. It is alleged that the requirements for the two cases are different.

The concern expressed in the Q&C is that wagons equipped with brake blocks (case A) and disk brakes (case B) could have different TSI conform brake performances. If these two kind of wagons are combined in a train the different brake performances could lead to high tensions and stresses within the train in longitudinal direction. This might overload the couplings. Examples for both cases in laden status are given:

- Case A: wagon of S type with brake block shall have a brake mass percentage of minimum $\lambda=65\%$.
- Case B: wagon of SS type with disk brakes shall have a brake mass percentage of minimum $\lambda=100\%$ and

¹ OJ L 191, 18.7.2008, p. 1–45, as last amended by Directive 2009/131/EC (OJ L 273, 17.10.2009, p. 12–13).

2. The analysis has shown that the aforesaid table requires for the laden status the same minimum braking performance for case A and B as long as the “wagon type” remains the same. That means within the wagon type “S” or the wagon type “SS” there is no difference between wagons equipped with brake blocks or disk brakes.

Subsequently the concern expressed in the Q&C applies also for SS wagons equipped with brake blocks when these are combined with wagons of type “S”.

3. It appears that the Q&C confuses the authorisation for placing in service with the permission to operate the wagons in a particular way. In fact the authorisation for placing in service just covers that the subsystem complies with a set of rules necessary to achieve interoperability and to meet the essential requirements. The responsibility for the safe operation is allocated to the RUs (Article 4(3) of the Safety Directive 2004/49/EC). That means that the RU has to decide if and under which conditions wagons can be combined and operated within one train.

4. The Q&C explicitly asks if a wagon that is equipped with disks brakes comply with the TSI if it meets only the required values of case A. The answer is yes.

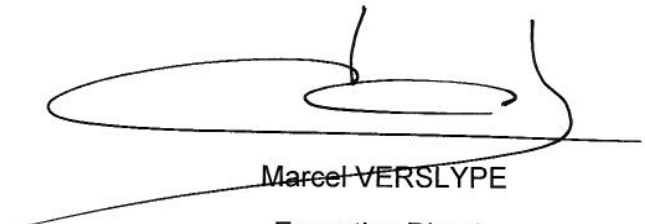
5. The draft Commission Regulation on the revised WAG TSI consists of an amended version of the above mentioned table. This amended version does not distinguish any longer between the cases as proposed by the Q&C although the distinction would not cause any problem.

4. The opinion

1. As the combination of wagons in a train is not in the scope of the TSI the Agency sees no need for action.

2. In addition within the wagon type “S” and the wagon type “SS” loaded there is no difference between wagons equipped with brake blocks or disk brakes in the current WAG TSI. Differences in loaded state exist only between wagon type “S” and wagon type “SS” independently from the selected brake technology. The RU is responsible for the safe operation and has to decide if and under which conditions wagons can be combined and operated within one train. This is not in the scope of TSIs.

Valenciennes, 02/08/2012



Marcel VERSLYPE
Executive Director

ANNEX 1

Note from DG-MOVE B2 referenced D (2012) 643.673 – 30/05/2012