

AALS Safety Committee Consultation process on braking.

Explanatory note

re draft AALS Interoperability Code of Practice section 4 on braking requirements.

Dated 9/9/2018. Coordinator: Allan Wallace

The consultation process operates on contributions and discussion via mail or email, officially through representatives who would generally be elected officers of a member society. Unofficial private communications are also engaged.

Recently, a significant amount of discussion from individuals has appeared on social media. The committee considers that informal discussion is to be welcomed and encouraged since it provides a sounding board, albeit subject to all the upsides and downsides of such platforms.

A resonant theme on the Facebook platform is to question why any change to the existing code section is necessary and to resist the imposition of additional requirements. While the views are genuinely felt, it seems clear that some clarification and explanation is in order. It appears that some justifications for the update have been overlooked and some ramifications misunderstood.

1. The proposal addresses some inconsistencies in the present requirements. For example, many small locomotives have always been in breach of clause 4.1.1, and many operations have always been in breach of 4.3.2.
2. The proposal addresses some ambiguities in the present requirements. For example, 4.2.2 needs clarification as to whether a braked carriage means two bogies, one bogie or one wheelset.
3. The proposal is structured by type of train rather than by type of vehicle, better reflecting the level of risk across today's more diverse range of train sizes and operations. It is unreasonable to expect small operators to comply with the same requirements as for heavy operators. This aspect needs to be future-proofed.
4. The proposal is actually simpler. 13 clauses have been replaced with 5, and the key information is logically arranged in a table with only one column applicable to a given train. This removes ambiguities related to train size. The committee submits that it is easier to follow and apply.
5. The proposal is based on a survey of current operations and is unlikely to impose any further requirements on an existing well-run operation. Societies are invited to review it against their current practices and assist the committee to fine-tune if necessary.
6. The need for a society to create a braking policy is not new – for some years it has been a requirement of the Operations Code, hence it is not an imposition of this update.

The committee is committed to serving the membership without bias and has worked hard to present a proposal which is intended to

- (1) inform and support (rather than impose),
- (2) protect the smaller operators from unreasonable requirements for heavy operations
- (3) make it clearer and easier for safety officers to check a train for minimum requirements
- (4) protect the autonomy of the Societies to define and administer braking performance requirements appropriate for their own operation
- (5) be consistent with good engineering practice and experience.
- (6) Enhance safety!

The draft is submitted to the membership for serious consideration and discussion.

[End of document]