

Clause 4.1 of the **“CoP- Standards for Interoperability and Safety of Miniature Railways, Road Vehicles and Plant”** says “A Society shall have a braking policy in accordance with the Clause 5.1.1.2” of **CoP - Operation of Miniature Railways, Road Vehicles and Plant”**”, which says “Each Society shall establish a suitable braking policy for trains.....based on grades, weight and speed of trains.....”

Here are two clauses which say the same thing and circularly refer to each other. Nowhere is there any clue as to what the values and methods of testing may be!!!! If it is the intention of AALS to have an overall code mandatory on Clubs then such values and methods must be specified.

Therefore Clause 4.1 of the **Draft Replacement “CoP- Standards for Interoperability and Safety of Miniature Railways, Road Vehicles and Plant”** is meaningless.

It is an undeniable fact that an AALS Code of Practice is treated as a **virtual legal** document by the Insurance industry in the event of any claim being raised. If a Club is unable to meet an AALS Code, then the onus for any claim reverts to the Club itself with consequent and serious financial implications for that Club.

My formal time in the “hobby” and therefore association with AALS is yet to reach a second anniversary. Notwithstanding that I have learnt the importance of AALS codes of practice in the “hobby” but I am alarmed at the lack of definable and measurable values and methods in this Braking Policy area. To this end I would draw AALS’s attention to following the principles of a well-documented and accepted international standard such as Standards Australia’s “SG-006-Rules-for-the-Structure-and-Drafting-of-Australian-Standards”.

Clauses 4.2 and 4.3 of **Draft Replacement “CoP- Standards for Interoperability and Safety of Miniature Railways, Road Vehicles and Plant”** would fail the tests of Section 5 of SG-006. Here paragraphs 5.3 - “Performance principle” and 5.4 –“Verifiability” would be particularly applicable because, in the **proposed draft**, there is -

- no definition of any test values nor methods in the draft 4.1-4.3 CoP clauses.
- circular open-ended inter-references in each code, Operations and Standards, to each other.
- no attempt to put limits (values and methods) on practical “safe” values.

In reviewing this Braking amendment, I have inadvertently found other considerable inconsistencies in definitions and clauses applied to other aspects within both of these codes. These inconsistencies make each code difficult to follow and understand in some areas.

By way of example, one difficulty could be overcome by truncating the titles of both Codes to briefer versions, such as **“CoP -Operations”** (instead of CoP - Operation of Miniature Railways, Road Vehicles and Plant”) and **“CoP – Standards”** (instead of “CoP- Standards for Interoperability and Safety of Miniature Railways, Road Vehicles and Plant). Briefer titles deconfuse the long unwieldy titles of the Cop’s and better reflect their individual contents and purpose. Besides which it is quicker to type and easier to say!!

Already these words, Operations and Standards are printed on the covers of each CoP in very large and bold font.....! So I rest my case...?

We submit these comments, not to denigrate the works of the draftees, but to encourage them to realise the importance and ramification of AALS Codes in general, where some improvements could be made and to be aware of world-wide accepted principles in preparing such standards/codes.

With regards,
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