

Dear Stefano

Thanks for the template.

Herewith the PWF response.

Regards

Geoff Pratt

Secretary General

Private Wagon Federation

Consultation Response from Private Wagon Federation

Question 1: Do you agree that we should not change the current position on the exclusions from ROGS? If you do not agree, please explain why.

Yes.

Question 2: Do you know of any circumstances in which vehicles registered and maintained according to the laws of a non-EU Member State enter Great Britain? If so, please explain.

RIV Wagons registered in Non EU Member States which were accepted as complying with UIC 503 will still be operating under their Country's maintenance rules unless they remain within UK for more than 12 months when UK rules apply.

Question 3: Do you know of any circumstances in which vehicles with track gauges other than standard gauge enters Great Britain? If so, please explain.

Clearly broad gauge wagons do not fit the UK track gauge but wagons previously operated between Spain and UK - Transfesa - which changed to standard Continent track gauge at the Spanish border and vice versa.

Question 4: Do you know of any circumstances in which military equipment or special transport will require an ad hoc permit to be delivered prior to being in service? If so, please explain.

No experience. Suggest you contact MoD.

Question 5: Do you know of any circumstances in which those vehicles that are excluded from the mainline railway, as defined in ROGS, may require an ad hoc permit to be delivered prior to being placed in service in Great Britain? If so, please explain.

No.

Question 6: Do you agree that RAIB should be the investigating body for accidents on tramways in Scotland?

Yes.

Question 7: Do you have any comments on the new definitions? If you have any objections, please could you explain why and suggest an alternative.

No.

Question 8: Do you agree that these regulations should contain the date by which domestic vehicles should have been registered in the NVR?

Yes, subject to the NVR system being in place in time.

Question 9: Do you have any comments on the proposal to extend the meaning of work to include voluntary work?

No.

Question 10: Do you have any other comments to make in relation to this consultation document?

Although it is decided to await the confirmation of the ECM Regulation - due January 2011 - to be sure of incorporating the full and correct ECM requirements into ROGS, it is noted from the draft ECM Regulation there is note of annual maintenance reports, which should be available to NSAs. In this respect it is also noted that the CSI Directive 2009/149/EC clearly has passenger rail in mind. Is it intended to draft a report format for freight maintenance reports to ensure some form of standardisation and therefore make certification of ECMs more comparable in that respect?