Oliver Stewart
RAIB Recommendation Handling Manager

4 December 2025

Mr Andy Lewis
Deputy Chief Inspector of Rail Accidents

Dear Andy,

RAIB Report: Derailment of a freight train at Llangennech, Carmarthenshire on 26 August 2020

I write to provide an update[1] on the action taken in respect of recommendations 1 & 2 addressed to ORR in the above report, published on 13 January 2022.

The annex to this letter provides details of actions taken in response to the recommendation and the status decided by ORR. The status of recommendations 1 & 2 is **'Closed'.**

We do not propose to take any further action in respect of the recommendations, unless we become aware that any of the information provided has become inaccurate, in which case I will write to you again.

We will publish this response on the ORR website.

Yours sincerely,

Oliver Stewart

[1] In accordance with Regulation 12(2)(b) of the Railways (Accident Investigation and Reporting) Regulations 2005

Recommendation 1

The intent of this recommendation is for Touax to validate, and where necessary improve, the way it manages the risk associated with its maintenance responsibilities for freight wagons operating in the United Kingdom.

Touax should commission an independent review of the actions it has taken to improve its management of maintenance following the accident at Llangennech and assess their completeness and effectiveness. In particular, this review should address:

a. the effectiveness of the processes that have been put in place to ensure that safety critical systems and components are fully and correctly maintained by those contracted to do so;

b. the appropriateness of current instructions concerning the inspection, maintenance, removal and reattachment of safety critical components;

c. the traceability of safety critical components;

d. its processes for learning from the experience of its own people and other maintainers;

e. the dissemination of safety critical information including the reporting of dragging brake events and similar irregularities affecting the safety of its freight wagons; and

f. the extent to which its staff understand their maintenance responsibilities and are competent to perform them.

The findings of the review should be fully assessed and implemented to the extent necessary to reduce the risk of accidents linked to the condition of wagons.

ORR decision

1. Touax commissioned Risktec to conduct an independent review of the actions taken to improve its management of maintenance following the accident at Llangennech and assess their completeness and effectiveness. The report made 18 recommendations on Touax which covered the six points (a-f) identified in the RAIB recommendation. Touax reported on 23 September 2025 that all of the Risktec recommendations had been closed.

2. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Touax has:

- taken the recommendation into consideration; and
- has taken action to close it.

Status: Closed.

Previously reported to RAIB

3. On 12 January 2023 ORR reported the following:

Touax has undertaken a series of measures aimed at improving management of maintenance, as set out in its response to the recommendation. The actions are also subject to review as part of the ECM recertification process Touax is currently undergoing.

Having met with Touax in December 2022, we are satisfied with the progress being made to address this recommendation. We will ask Touax to provide a progress update later this year once the new procedures are in place.

Update

4. On 23 September 2025 Touax provided the following update:

Please find attached our tracker outlining the actions taken in response to Recommendation 1 from the RAIB Report 01/2022 (Llangennech). The recommendations have been thoroughly reviewed, and where necessary, changes have been assessed and implemented.

TOUAX-BL-902-A
RAIB report 01.2022 r

On this basis, we consider Recommendation 1 to be closed.

5. As the Risktec report contained a number of document references, we asked Touax for a list of the documents and their purpose. Touax provided the following information on 13 November 2025:

I have only listed the documents which are linked to a recommendation or are part of a mitigation by Touax as the Risktec report summarises each document referenced.

Document reference	***Title***	***Summary***
DT-092 part 2	*Full brake test record sheet*	*UK document - where the results of brake tests are recorded* *Note – part 1 is for EU*

DT-102	*Exchange of information during maintenance of freight wagon*	*EU document - which is not used within the UK*
DT-103	*Wheelset movement sheet*	*UK document – when wheelsets are exchanged this document is used to track the serial numbers and dates of the removed and fitted wheelsets*
DT-214 part 2	*Wheelset maintenance leaflet, Part 2 - UK*	*UK document – maintenance specification for wheelsets overhauled in the UK. Supplied to wheelset maintenance providers* *Note – part 1 is for EU*
ECM-633	*Register of external safety alerts and recommendations*	*UK and EU document – used to register any information received from outside of Touax which has the potential to impact Touax (NIR/SAIT, NIB reports, information provided via email or within industry circulated documents NOC log).*
AN-756	*Risk assessment for SCC and SRC*	*UK and EU document – risk assessment to identify which vehicle components are classified as Safety Critical or Safety Relevant*
DT-786	*UK mainteance and repair paperwork Matrix*	*UK document – aid memoir for what paperwork /documents are to be completed during maintenance and repair events. Issued to mainteance providers.*
AN-847	*Overhaul of International wheelsets as per VPI*	*UK and EU document – risk assessment for wheelsets used in the UK to be overhauled according to the VPI and international standards replacing UK specific and outdated standards*
ASM-858	*Brake component data check*	*UK and EU document – special one of check to capture air brake component serial numbers and overhaul dates*
MS-863	*Repair / Replacement procedures for brake components*	*UK document – maintenance specification detailing the specific requirements for exchanging brake components (task analysis)*
Tech-05	*Risk evaluation matrix*	*UK and EU document – risk assessment process document and template*
Tech-04	*Supplier approval and monitoring*	*UK and EU document – supplier approval and audit process and audit record sheets*
Tech-14	*Structured exchange on information*	*UK and EU document – process and information on the exchanges of safety*

		and regulatory information with NSA, NIB, RU, IM, contactors, etc
FM-07	*Characterization Critical Withdrawals*	*UK and EU document – fleet management quality document for the process of identifying events which may need to be investigated*
PP5	*Fleet Management*	*UK and EU document - Quality document for the overarching process for all fleet management. Contains FM documents.*

Recommendation 2

The intent of this recommendation is to identify and mitigate the risk associated with the maintenance of safety critical components on freight wagons at Robeston.

Touax Rail, in conjunction with DB Cargo Maintenance, should carry out a task analysis of the processes that are used for the maintenance of fuel tank wagons operating out of Robeston terminal, taking full account of the risk associated with tasks being completed incorrectly and the working environment at the site. A time-bound plan should be developed for any necessary improvements that are identified.

This recommendation may also apply to other ECMs

ORR decision

6. Touax, working in conjunction with DB Cargo Maintenance (DBCM), has completed a task analysis of maintenance processes for fuel tank wagons operating from Robeston terminal and updated maintenance specifications and issued new supporting documentation.

7. Touax confirmed the output of the task analysis was shared with Davis Wagon Services (DWS) as part of the handover of the maintenance contract from DBCM to DWS.

8. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Touax has:

- taken the recommendation into consideration; and
- has taken action to close it.

Status: Closed.

Previously reported to RAIB

9. On 12 January 2023 ORR reported the following:

The responses from Touax and DB Cargo Maintenance address the key points in the recommendation. Touax, as the ECM, and DB Cargo Maintenance as the wagon maintainer, have carried out a review of the maintenance tasks carried out at the Robeston terminal. Touax has identified Q4 2022 for the implementation of any improvements to the process. We will ask Touax for an update once those improvements are in place.

Update

10. On 9 November 2023 Touax provided the following update:.

As the recommendation is for tank wagons operating out of Roberston terminal in addition to the TEA wagons involved in the incident it also includes the TIA and TDA tank wagons Touax lease to Puma.

In June 2023 new maintenance specifications were issued for the TIA and TDA wagons. New maintenance specification for the TEA wagon has been drafted and is in the review stages.

In support of these documents a stand-alone specification for the replacement of air brake components has been written and is undergoing review.

Touax have held several meetings with DBC in order to stablish a list of tasks which task analysis is needed; this is recorded in Touax document AN-801. Once all updated documents have been issued a further review with DBC can be planned.

Estimated completion of all remaining specifications is Q4 2023.

11. On 9 February 2024 Touax provided the following update:

Updated maintenance specifications for the TIA and TDA wagons were issued in August 2023 and Maintenance specifications for the TEA wagons (MS-829 TF25 Bogie maintenance and MS-432 TEA tank wagon maintenance specification) are pending issue. Draft copies have been shared with DBCM to help identify any areas where additional information is needed.

12. On 19 September 2024 Touax provided the following update:

Please find attached maintenance specifications linked to recommendation 2.

We have significantly reviewed and updated the maintenance specification MS-432-D and introduced specifications MS-829-A for TF25 bogie maintenance and repair. We have also issued MS-863-A which details repair and replacement processes.

13. On 16 January 2025 Touax provided the following update:

TOUAX-BL-902-A
RAIB report 01.2022

14. On 23 September 2025 Touax provided the following update:

In relation to Recommendation 2, as previously communicated, we shared the TOUAX internal tracker. Since then, we have updated the maintenance specifications and issued new supporting documentation for the tank wagon fleet. In addition, supporting documents have now been issued for the other TOUAX fleets.

With the completion and distribution of this documentation, we consider Recommendation 2 of RAIB Report 01/2022 to also be closed.

15. On 21 October 2025 ORR wrote to Touax as follows:

Please can you confirm the task analysis has been shared with DWS as part of info handover from DBCM.

16. Touax responded on 13 November 2025 as follows:

DWS were issued the below documents which contain the task analysis information.
MS-432 Tank wagon maintenance specification, issued on 31/01/2025 and acknowledged it on 04/04/2025.
MS-863 Repair / Replacement procedures for brake components, issued on 06/06/2024 and acknowledged it on 06/06/2024
MS-829 TF25 bogie maintenance specification, issued on 24/09/2025 and acknowledged it on 29/09/2025

It is also worth nothing that Touax no longer lease wagons to Puma/Impala and are therefore do not maintain wagons at Milford Haven. All wagons have been moved off site. To my knowledge the handover from DB Cargo Maintenance to DWS at Milford Haven has not yet been completed.

Previously reported to RAIB

Recommendation 1

The intent of this recommendation is for Touax to validate, and where necessary improve, the way it manages the risk associated with its maintenance responsibilities for freight wagons operating in the United Kingdom.

Touax should commission an independent review of the actions it has taken to improve its management of maintenance following the accident at Llangennech and assess their completeness and effectiveness. In particular, this review should address:

a. the effectiveness of the processes that have been put in place to ensure that safety critical systems and components are fully and correctly maintained by those contracted to do so;

b. the appropriateness of current instructions concerning the inspection, maintenance, removal and reattachment of safety critical components;

c. the traceability of safety critical components;

d. its processes for learning from the experience of its own people and other maintainers;

e. the dissemination of safety critical information including the reporting of dragging brake events and similar irregularities affecting the safety of its freight wagons; and

f. the extent to which its staff understand their maintenance responsibilities and are competent to perform them.

The findings of the review should be fully assessed and implemented to the extent necessary to reduce the risk of accidents linked to the condition of wagons.

ORR decision

1. Touax has undertaken a series of measures aimed at improving management of maintenance, as set out in its response to the recommendation. The actions are also subject to review as part of the ECM recertification process Touax is currently undergoing.

2. Having met with Touax in December 2022, we are satisfied with the progress being made to address this recommendation. We will ask Touax to provide a progress update later this year once the new procedures are in place.

3. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Touax has:

- taken the recommendation into consideration; and
- is taking action to implement it

Status: Progressing. **ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.**

Information in support of ORR decision

4. On 28 October 2022 Touax provided the following initial response:

Rec 1 a - *As required by ECM 779/2019 Touax have completed a risk assessment to identify Safety Critical Components (SCC). The RA is based on the industry guidance from UIP and on the definition of safety critical components found in Commission Regulation (EU) No 1302/2014 "Safety critical components are components for which a single failure has a credible potential to lead directly to a serious accident". This is the only available definition of Safety Critical Components referring to freight wagons.*

A review of this risk assessment has taken place and in addition to the UIP guidance the recommendation of "Rail Wagon Associations working group into SCC" was also considered. The result of this review is that the RA maintains that only wheels and axles are classed as SCC. however, components that have an impact on safety but would not directly lead to a serious accident has been classed as safety relevant components (SRC).

Air brake components are classed as SRC as they cannot lead directly to a to an accident but are part of a series of events that can lead to a serious accident.

Touax maintenance documents have been updated and distributed to provide traceability of the SRC. Documents and necessary IT tools for SCC are already in place.

Updates have also been applied to the audit regime to better survey our maintenance providers that carry out work on SCC and SRC.

Further actions are dependant of the external review and the outcome of recommendations 2 and 3.

Rec 1 b - *Since the incident the maintenance specification for the TEA tank wagons has been updated to provide detailed instructions on the attachment of the C3W distributor and relay valve.*

New requirements have been added to record serial numbers of air brake equipment as they have been classed as SRC when exchanged, this applies to all Touax operated wagons not just the tanks. Toaux wagons with the similar design components are also going through an update to include the same level of detail for SRC.

There is an ongoing project to record these details for all wagons (UK and EU) within the Touax asset management system to provide traceability of SRC.

This recording of details on the maintenance documentation is supported by the audit process.

Further actions are dependant of the external review.

***Rec 1 c -** Following the definition of SCC only wheelsets require full traceability we have updated our processes to provide traceability to SRC. Updated maintenance specification's requires maintenance providers to report serial numbers of SRC within brake system at exchange.*

As Wheelsets are classed as a SCC, traceability is one of Touax safety indicators for many years. Serial numbers of wheelsets are recorded at maintenance events and at exchange. This is then entered into our asset management system. We also track repairs/overhauls to each wheelset which is done in a similar manner, records are completed by the workshop and then entered into our system. In addition we have an ongoing project of automated data transmission from wheelset maintenance providers.

SRC components are also traced to a similar level. Components serial numbers are recorded at exchange, at maintenance and on overhaul / repair orders.

Further actions are dependant of the external review

***Rec 1 d -** Touax quality management documents Tech 14 for the exchange of information and Tech 15 incident report have been updated to include the Safety Engineer UK/EU (SE) and that the SE is responsible for ensuring that information relevant to Touax/third party incidents are actioned accordingly. Previously all EU and UK exchanges and incident management went through the Maintenance Safety Manager and didn't include some UK specific exchanges.*

Summary sources of information, Network Rail National Operations Control, NIR, Gotcha, RAIB, third party maintenance providers used to provide maintenance function 4, TOPS, SAIT, NSA's, RU/FOC, other ECM's, professional Associations (RWA, FTC etc), Infrastructure managers and our customers.

These updates provide detail on how Touax exchange information. Depending on the content of these communications we will register that we have received it and what actions are required. It is only recorded when the information influences safety or is related to a Touax vehicle type (regardless of whether the vehicle in question is owned/leased by Touax).

Meetings are held weekly and quarterly to review information and incidents where knowledge and experience can be shared.

If an individual or group show a need / desire to learn more about a particular subject or system, trainings are arranged internally / externally. This can be triggered by employee annual competence review, weekly/quarterly meetings or following investigations.

Further actions are dependant of the external review.

Rec 1 e - *Touax is observing (among others) dragging brakes through NIR, NR event log and information given to the fleet managers from the FOC and our customers. Touax asset management system (Kheops) has had additional defect codes created to track and trend when dragging brakes are reported which will be reviewed during the weekly technical meeting for class 5 and during Quarterly Maintenance Reviews for class 4.*

Note: Touax use the codes within the General Contract of Use (GCU) along with some of our own to provide KPI's on wagon safety and performance. The codes are classed 3 – 5 with 5 being the most serious.

General trends for both classes are observed and analysed during Touax Quarterly Maintenance Review.

NB. SMIS is not an exchange tool available for Touax, because we are not an FOC. However, information like this is regularly communicated to fleet management from the FOC, our maintainers and via our process document Tech 14.

Further actions are dependant of the external review and implementation of other recommendations (i.e., access to SMIS)

Rec 1 f - *Since the incident the UK fleet managers have received training on the ECM functions and their roles to play in fulfilling the requirements.*

Trainings are organized on annual basis; last training took place March 2022.

Touax employment process requires staff to have required skillset to fulfil the role in which they are to undertake (Qual 14) which is checked during the interview process. Any deficiencies within this skillset are trained at the start of employment – for which Touax has onboarding process defined. Competence is checked during annual staff reviews where the staff are scored on the aspects required for the role. Staff are also able to request support for subjects they feel weak on, and additional train can be arranged if required. This is supported by the Touax internal audit process and training arranged as required.

Touax Qual 14, documents each roles required skillsets and experience from fleet manager to COO.

External contractors are audited by our Tech 04 process to ensure that all maintenance staff are compliant with Touax instructions, they are applying it correctly and are using staff suitable for the task in hand (competent).

Upon completion of the review any recommendations made will be reviewed and implements as required Details of any changes

Touax make to our processes or documents will be available to the ORR for reference.

In addition to the recommendation's comments Touax have:

- Risk assessed the continued use of the TEA tank wagons. The assessment required all wagons to be stopped and a detailed inspection and brake testing to be carried out.

- Started fitting the wagons with telemetry equipment that will monitor the wagons movements and alert Touax if excessive shocks are put through the wagons.

- Started fitting the wagons with RFID Tags which will allow for wagon identification by wayside monitoring equipment

- Commissioned and completed an independent brake expert to review
- *The Touax brake test procedures and how this is carried out by our maintenance provider.*
- *The design of the brake system fitted to the TEA tank wagon*

- Made changes to the roles and responsibilities of Touax fleet managers and engineers to be support the UK activities. Since 2020 Touax UK specific team responsible for maintenance grew from 3 to 6 full time employees.

- Introduced a new position of Safety Engineer UK (there is also a Safety Engineer EU).

- Mandated that all TEA wagon air brake valves are overhauled to the OEM processes

- Additional site visits and audits to what was planned as part of our annual schedule.

Recommendation 2

The intent of this recommendation is to identify and mitigate the risk associated with the maintenance of safety critical components on freight wagons at Robeston.

Touax Rail, in conjunction with DB Cargo Maintenance, should carry out a task analysis of the processes that are used for the maintenance of fuel tank wagons operating out of Robeston terminal, taking full account of the risk associated with tasks being completed incorrectly and the working environment at the site. A time-bound plan should be developed for any necessary improvements that are identified.

This recommendation may also apply to other ECMs

ORR decision

5. The responses from Touax and DB Cargo Maintenance address the key points in the recommendation. Touax, as the ECM, and DB Cargo Maintenance as the wagon maintainer, have carried out a review of the maintenance tasks carried out at the Robeston terminal. Touax has identified Q4 2022 for the implementation of

any improvements to the process. We will ask Touax for an update once those improvements are in place.

6. After reviewing the information provided ORR has concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, Touax and DB Cargo Maintenance (DBCM) have:

- taken the recommendation into consideration; and
- is taking action to implement it

Status: Progressing. **ORR will advise RAIB when further information is available regarding actions being taken to address this recommendation.**

Information in support of ORR decision

7. On 28 October 2022 Touax provided the following initial response:

In response to the recommendation Toaux have reviewed the data within our asset management system in regard to the maintenance and repair actions carried out by DB Cargo at the Milford Haven facility. The data was shared with DB Cargo.

Meetings were held on site to review the documentation available to staff that carry out repair work.

Together with DBC Maintenance risk analysis has been completed which identifies the repair actions and their consequences if the repair is not completed correctly, the existing controls and where task analysis is needed.

Work is ongoing to with DBC, and we are in progress of compiling OEM recommendations and best practice guidelines to produce task analysis documents which can be issued to other Touax maintenance providers.

Due to the complexity of this task completion date is set for end of Q4 2022.

8. On 28 October 2022 DB Cargo provided the following initial response:

Review, Risk Assessment, Task Analysis and Continuous Improvement

DBCM has reviewed maintenance activities completed on Touax wagons at Robeston and the associated Touax maintenance documents, identifying and enhancing any areas for improvement and identifying action points for Touax. Touax has issued a number of updates to maintenance documentation (principally by correspondence) and has agreed to implement those changes by way of revised maintenance documentation which gives all parties the opportunity to raise any technical issues on daily/weekly productions calls.

DBCM has instigated several meetings and site visits with Touax to review the maintenance of Touax wagons and review Touax maintenance documents. From these meetings and visits, Touax has completed a review of all maintenance tasks completed on Touax wagons at Robeston and a review of maintenance tasks completed on SCS. As part of this process, Touax collated information from maintenance billing records and maintenance events recorded by Maximo. A comparison of the data noted task-completion and frequency. Touax and DBCM

identified eleven tasks/maintenance events. A risk assessment was completed to identify all risks, the existing control measures and any areas for further risk mitigation. From the review of maintenance events, and in conjunction with the work completed by the RWA, Touax (in conjunction with DBCM) has set out the foundations of a RBTA and TBP. We have noted above that DBCM has done all that is practicable in this regard and the remaining actions need to be completed by Touax as the ECM. We understand that Touax will provide further particulars to ORR as to when these actions will be completed. See Reference 1 for more details.

DBCM has engaged with all parties associated with the maintenance of rail vehicles at Robeston and several meetings have been held on site to discuss and further enhance maintenance activities and site facilities.

DBCM has further enhanced communications with Touax to ensure that all daily production issues are resolved in a timely and effective manner and in relation to the sharing of information following incidents involving Touax vehicles (this has also been applied to other ECMs). DBCM has also further ameliorated the control of documentation issued by Touax and the manner in which third-party documentation is received, uploaded, stored and made available to all relevant personnel.

Site Audit

Site audits have been undertaken at Robeston which continue to demonstrate that the site is suitable and sufficient for maintenance to be completed on rail vehicles with an equal focus on continuous development.