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28 September 2011

Ms Carolyn Griffiths
Chief Inspector of Rail Accidents
Rail Accident Investigation Branch
Block A 2nd Floor
Dukes Court
Dukes Street
Woking
GU21 5BH

Dear Carolyn

Near miss involving a freight train and two passenger trains, Carstairs

I write to report¹ and update on the consideration given and the action taken in respect of the recommendations addressed to ORR in the above report published on 19 March 2010.

The annex to this letter provides full details of the consideration given/action taken in respect of recommendations 1, 2 and 3 where:

- recommendations 1 and 3 have been implemented² and;
- recommendation 2 has been implemented by Colas Rail, DB Schenker, GB Railfreight and Freightliner and is in the process of being implemented³ by DRS.

We do not propose to take any further action in respect of recommendations 1 and 3 unless we become aware that any of the information is inaccurate in which case we will write to you again⁴. We expect to provide an update to recommendation 2 in November 2011. We expect to publish this report on the ORR website on 14 October 2011.

Yours Sincerely

Chris O'Doherty

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

² In accordance with Regulation 12(2)(b)(i)

³ In accordance with Regulation 12(2)(b)(ii)

⁴ In accordance with Regulation 12(2)(c)





Initial Consideration by ORR

All 3 recommendations contained in the report were addressed to ORR when RAIB published its report on 31 January 2011.

After considering the report / recommendations, on 22 February 2011, ORR passed all three recommendations to Freight Operating Companies asking them to consider and where appropriate act upon them.

Details of consideration given and any action taken, in respect of these recommendations are provided below.

Recommendation 1

The intent of this recommendation is to mitigate the effects of a driver extending the interval between running brake tests when their locomotive-hauled train is climbing a rising gradient.

It aims to mitigate any potential reduction in braking performance caused by snow or ice ingress. It will also improve the effectiveness of the existing running brake test in snowy conditions by detecting any such reductions.

Freight operating companies in conjunction with the Rail Safety and Standards Board should make a proposal to review the existing arrangements in section 18.2 of module TW1 of the Rule Book for running brake tests in snowy conditions.

The review should consider the practicalities of carrying out running brake tests when driving locomotive hauled trains on rising gradients and identify how these rules can be modified if drivers have not carried out a running brake test for more than five minutes. Options for consideration should include a requirement that drivers of locomotive-hauled trains should make a full service brake application and sufficiently retard their train as soon as they have passed over a summit and onto a descending gradient

(paragraphs 142a, 142b, 143b and 146a).

Details of steps taken or being taken to implement the recommendation

British American Railway Services(BARS) in its response of 11 April 2011 explained

When BARS' subsidiary Devon and Cornwall Railways(DCR) moves to operating trains and has got the structure in place then it will take active steps to join in the discussions and actions to brief drivers and their managers to ensure it actively promotes the change being advised.

Colas Rail Ltd in its response on 4 April 2011 advised:



Annex A

The Colas Rail National Delivery Manager Freight is a member of the Freight Operating Group and the incident at Carstairs has been discussed within the group.

Colas Rail will actively participate with the RSSB through the group and review the practicalities of carrying out running brake tests.

Colas Rail is aware of the issue of undertaking running brake tests during snow and poor weather conditions.

Colas Rail provided ORR with two communications forwarded to Colas driving staff reminding them of module TWI 18.1 and 18.2; one communication was a reminder notice and the other formed part of the monthly driver's safety bulletin.

Colas Rail also provided ORR with its winterisation procedure TO4-252 "Class 66/8 Locomotive Vehicle Maintenance and Overhaul Instruction" It is the intention of Colas Rail to add Class 47s to the T04-252 procedure.

The ORR, through its attendance at the Rail Freight Operations Group (RFOG), is satisfied that Colas Rail is implementing the RFOG Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

GB Railfreight Ltd in its response on 6 April 2011, advised:

In respect of recommendations 1 & 3, the RFOG [Rail Freight Operations Group] (which includes GBRf) met with the RSSB on 16 February 2011 and discussed the recommendations.

An agreement was reached as to how these Rule Book clauses could be modified to improve the risk control afforded by them. As a consequence of this, the RSSB drafted the proposed amendments and these were presented and approved for industry consultation at the TOMSC [Traffic Operation and Management Standards Committee] (30 March 2011).

The amendments will be in the October Rule Book amendments due to come into force in December 2011.

However, ahead of this, GBRf introduced additional instructions addressing these risks and these were issued in December 2010.

GBRF therefore considers that it has addressed the requirements of these recommendations ahead of the Rule Book amendments being introduced.

The RFOG undertook a great deal of work in relation to both the Carstairs and Carrbridge incidents throughout 2010, the end product being an RFOG Approved Code of Practice.

GBRf has provided ORR with copies of:

GBRf General Operating Appendix, Module A5 'Operation of Freight Services in Winter Conditions'; and



Annex A

The Rail Freight Operations Group Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

DB Schenker Rail (UK) in its response on 12 April 2011 advised:

DB Schenker Rail (UK) can confirm that, as recommended by the ORR, the respective issues were discussed by the Rail Freight Operators Group [RFOG], over the course of a number of meetings.

The issues were actually addressed prior to the issue of the RAIB report and resulted in the issuing of the first RFOG Code of Practice "Operation of Freight Services in Winter Conditions", which was issued in November 2010, which addresses recommendation 2.

Recommendations 1 & 3 were also addressed with RSSB via RFOG, and as a result amendments to the respective rules will be issued in June 2011.[ORR has confirmed that the rule book changes will come into force in December 2011].

DB Schenker Rail (UK) is an active member of RFOG, and the code of practice is heavily influenced by the specific instructions we issued internally during the 2009/10 winter period. In addition the Operations Standards Manager, DB Schenker Rail (UK) is the Freight sector representative on TOMSC (Traffic Operation and Management Standards Committee), the committee where the proposed rules changes were debated.

Freightliner in its response on 4 May 2011 advised:

In relation to this recommendation Freightliner is aware that ORR has been furnished with the Rail Freight Operators Group [RFOG] Approved Code of Practice [ACOP] which deals with this practise.

In addition Freightliner has amended some sections to include the introduction of TB 112 [Traction Bulletin 112 'FSA / FTA Wagons – Speed Restrictions when working in Falling or Freshly Laid Snow, which details speed restrictions for trains that have a consist of 50% or more of Freight liner's FSA/FTA wagons] as well as the introduction at each Freightliner Intermodal location de-icing equipment which shall be used on each train during icy weather on arrival at a location with further de-icing before departure, if found at Train Preparation time to require such.

Freightliner provided ORR with a copy of its internal operations circular TB112.

Direct Rail Services in its response on 5 May 2011 advised:

DRS have participated in the joint RSSB / RFOG [Rail Freight Operators Group] workshop to review section 18.2 of module TW1 of the rule book.



Annex A

The new requirements of section 18.2 will be implemented upon the reissue of module TW1 of the rule book.

Draft rule book amendments (in bold)

Module TW1:

18.2 Working trains during snow conditions

You must carry out running brake tests as frequently as necessary to make sure that the automatic brake is operating effectively.

You must also carry out any additional train operating company instructions.

Module TW3:

You must test that the automatic brake is working properly. You must do this by carrying out a running brake test at the first opportunity after the beginning of the journey

You must also carry out a running brake test in good time before approaching:

- The first stopping place
- A crossing place on a single line where the train has to stop
- A steep falling gradient
- A terminus or dead end platform line

When you carry out a running brake test, you must do so from a speed that is high enough for you to be sure that :

- The brake is operating effectively, and
- The speed of the train is being reduced.

ORR Decision

The ORR through its participation, as an observer, at the RSSB Traffic Operation and Management Standards Committee, can confirm that the amendments to rule book modules TW1 and TW3 will come into force in December 2011.

The ORR, through its attendance at the Rail Freight Operations Group (RFOG), is satisfied that freight operating companies are implementing the RFOG Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

The ORR note that British American Railway Services is not currently operating freight services, but has committed to addressing the recommendation when it is in a position to operate freight trains.

After reviewing all the information received from Colas Rail (UK), GB Railfreight, DB Schenker Rail (UK), Freightliner Group and Direct Rail Services, ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, these companies have:

- taken the recommendation into consideration; and
- have taken action to implement it.



ORR will write to RAIB it becomes aware that the information above is inaccurate.

Status: *Implemented*

Recommendation 2

The intent of this recommendation is to ensure that any risks to the safety of the line resulting from falling or disturbed snow affecting different types of rolling stock are assessed and that rolling stock specific risk controls are considered in advance of adverse weather.

For example; when snow is falling or is being disturbed by the passage of trains, there is less potential for snow and ice ingress when trains run at a reduced speed. A lower speed also allows the train to stop in a shorter distance than it would otherwise if it had a problem with its brakes due to snow or ice.

Freight operating companies should carry out a review of the safety impact of their freight trains operating in snowy conditions.

The review should take into account the likelihood of different types of rolling stock disturbing lying snow and the consequent impact on the operation of their brake equipment.

The findings should inform a consideration of the need for rolling stock specific risk control measures to be imposed when justified by the conditions.

These could include reducing the maximum permitted speed of some types of train, additional actions by train staff and the re-routing of certain types of rolling stock away from adverse winter weather or from routes containing steep gradients.

(paragraphs 141a, 141b, 143a, 144a and 146b).

Details of steps taken or being taken to implement the recommendation

British American Railway Services in its response of 11 April 2011 explained

The driver team when formed will be briefed and disseminate a brief as part of the induction training of those recruited to operate trains under the DCR license.

Colas Rail Ltd in its response on 4 April 2011 advised:

Colas Rail operates a limited number of freight trains which are of a type that is commonly used throughout the UK network. The Colas Rail



Annex A

National Delivery Manager Freight will liaise with the Rail Freight Operating Group where a consensus of options will be discussed.

It is Colas Rail's stated aim that where an industry standard exists or a best practice document is in the railway domain Colas will ensure compliance with the procedure or standard.

ORR concluded that the initial response did not adequately address the recommendation and wrote to Colas Rail on 7 June 2011 requesting details of its review and any action it has or will be taking to address the recommendation. Colas Rail Ltd responded on 29 June 2011 and advised:

Colas Rail Freight Operation Unit has recognised that there is a potential for reduced effectiveness or potential failure of the braking system on the wagon types they operate. Colas Rail – Freight operates the following types of wagons:

- HHA Coal Hopper Wagons
- KFA Flat Wagons
- KSA Flat Wagons
- IHA Covered Steel Coil Carriers

All of the above wagons are fitted with brake blocks.

To control the risk of reduced braking capacity or brake failure Colas Rail – Freight will apply "Killfrost" to every brake rigging on all its wagon types as part of the train preparation duty. Where a train calls at an intermediate point and is subject to an addition train preparation the brake riggings will again be sprayed with "Killfrost"

The Colas Rail Class 66 Locomotive VMOI already contains a "Locomotive Winterisation Procedure" which includes the use of "Killfrost" during adverse weather conditions. This instruction will be updated to include a procedure for wagons during adverse and snowy weather conditions.

The new procedure will be briefed to all effected staff, including Contractors and will be implemented when weather conditions dictate.

GB Railfreight Ltd in its response on 6 April 2011 advised:

GBRf issued a Control Office instruction in January 2011 to address the risks associated with this.

The RFOG [Rail Freight Operating Group] undertook a great deal of work in relation to both the Carstairs and Carrbridge incident throughout 2010, the end product being an RFOG Approved Code of Practice.

GBRf has provided ORR with copies of:

- GBRf Control Office Instruction 'Operation of Freight Services in Severe Weather Conditions – Managing the Operational Risk; and



- The Rail Freight Operations Group, Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'; and

DB Schenker Rail (UK) in its response on 12 April 2011 advised:

DB Schenker can confirm that, as recommended by the ORR, the respective issues were discussed by the Rail Freight Operators Group [RFOG], over the course of a number of meetings.

The issues were actually addressed prior to the issue of the RAIB report and resulted in the issuing of the first RFOG Code of Practice "Operation of Freight Services in Winter Conditions", which was issued in November 2010, which addresses recommendation 2.

Recommendations 1 & 3 were also addressed with RSSB via RFOG, and as a result amendments to the respective rules will be issued in June 2011.

DB Schenker is an active member of RFOG, and the code of practice is heavily influenced by the specific instructions we issued internally during the 2009/10 winter period. In addition Nick Edwards, Operations Standards Manager, DB Schenker is the Freight sector representative on TOMSC, the committee where the proposed rules changes were debated.

ORR concluded that the initial response did not adequately address the recommendation and wrote to DB Schenker on 7 June 2011 requesting details of its review and any action it has or will be taking to address the recommendation. DB Schenker responded on 10 August 2011 and advised:

Firstly, DB Schenker would like to highlight the fact that immediately following the incidents at Carstairs & Carrbridge, DB Schenker produced revised procedures for working in extreme winter weather conditions. In addition to being briefed out to our staff, and implemented accordingly, they were shared with colleagues within the ORR as part of the ORR investigation into the Carrbridge incident.

It was one of these DB Schenker produced documents that formed the basis for the RFOG ACOP 001, Operation of Freight Services in Winter Weather Conditions. The purpose of this document is identified as being, 'to offer guidance to Freight Train Operators on how to minimise the risk associated with the effects of winter weather conditions on the operation of freight services'.

DB Schenker believes that this demonstrates that it was taking into consideration the safety impact of our trains operating in snowy conditions well before the RAIB reports, and recommendations contained therein were released.



Annex A

Throughout the winter period of 2009 / 2010 DB Schenker consistently reviewed its train operations, holding regular meetings, both internal and jointly with Network Rail to ensure that DB Schenker maintained safe operations.

As a direct result of these incidents DB Schenker undertook a formal review of the wagon type, FKA, that we operated over the highland route affected, and as a result of this we imposed route restrictions on these vehicles during times of severe snow conditions.

Further to this DB Schenker undertook a thorough review of the brake blocks and equipment fitted to these vehicles, using manufacturers' data, UIC data and service experience.

Whilst the composite blocks fitted to these vehicles are approved for use in Nordic conditions, DB Schenker has reverted to using sintered blocks, as used extensively in Europe, both in Nordic countries and over the Alps, for these vehicles, where they will operate over the highland routes.

DB Schenker has reviewed the performance of other vehicles authorised to operate (in winter conditions), and in this respect DB Schenker believe that all the vehicles DB Schenker operate are fully compliant and functional.

The DB Schenker, Engineering Standards Manager, holds regular monthly meetings with DB Schenker Technical Standards Engineers, who are responsible for nominated vehicles fleets, and regularly discusses the ongoing safety performance of the DBS wagon fleet. Following these incidents this group reviewed the wider fleet to ensure that all necessary precautions had been undertaken.

Prior to the next winter period this group will again review our existing arrangements.

In respect of the general operation of our services in winter conditions DB Schenker can confirm that before the next winter period DB Schenker will be undertaking an internal review of our preparedness, and will be working with colleagues in Network Rail in respect of the wider infrastructure issues.

Freightliner in its response on 4 May 2011 advised:

Freightliner has reviewed the performance of its trains in snowy conditions, i.e. falling snow or when snow has the potential to be disturbed. This review resulted in raising NIR 2678 and our internal operations circular TB112 [Traction Bulletin 112 'FSA / FTA Wagons – Speed Restrictions when working in Falling or Freshly Laid Snow, which details speed restrictions for trains that have a consist of 50% or more of Freight liner's FSA/FTA wagons].



As this recommendation has the dependency of infrequent snowy conditions to conduct in-depth research work to look at the effect on different consists, speed, loading conditions, topography etc. of which we have been unable to facilitate.

However, Freightliner has captured real time feedback on train braking performance during the winter of 2010 and are confident that the wagons that present the greatest risk are the FSA/FTA's, which Freightliner now has suitable operating instructions for.

Freightliner has provided ORR with a copy of Its internal operations circular TB112

Direct Rail Services in its response on 5 May 2011 advised:

DRS will carry out a risk assessment for all the types of rolling stock it operates. This assessment will look to 'rate' the performance of different types of vehicles in snowy conditions based on previous incidents bogie type, brake type and brake block type and identify any rolling stock types where specific control measure are necessary. Guidelines will be produced for use when carrying out Traffic Examinations / In Service Examinations on acceptable / unacceptable amounts of build up of snow / ice on rolling stock.

Timescale: End September 2011

ORR concluded that the initial response did not adequately address the recommendation and wrote to DRS on 7 June 2011 requesting details of its review and any action it has or will be taking to address the recommendation. ORR expects DRS to provide this information no later than October 2011. ORR will provide an update to RAIB in November 2011

ORR Decision

The ORR, through its attendance at the Rail Freight Operations Group (RFOG), is satisfied that freight operating companies are implementing the RFOG Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

The ORR note that British American Railway Services is not currently operating freight services, but has committed to addressing the recommendation when it is in a position to operate freight trains.

The ORR concluded that DB Schenker Rail, Colas Rail and Direct Rail Services initial responses did not adequately address the recommendation and therefore wrote to them on 7 June 2011 asking that they provide ORR with details of their review and any action they have taken or will be taking to address this recommendation. Further information provided by Colas Rail and DB Schenker is included above.



After reviewing all the information received from Colas Rail (UK), GB Railfreight, DB Schenker Rail (UK) and Freightliner Group, ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, these companies have:

- taken the recommendation into consideration; and
- have taken action to implement it.

Status: *Implemented:* Colas Rail, DB Schenker, GB Railfreight, Freightliner.

In progress: DRS – ORR will provide an update to RAIB in November 2011.

Recommendation 3

The intent of this recommendation is to address an anomaly in the Rule Book which requires trains that can travel at more than 100 mph (161 km/h) to reduce their speed by 10 mph (16 km/h) below the permissible line speed (down to a minimum of 50 mph (80 km/h)), which does not apply to other trains, including freight trains, that can run at speeds above 50 mph (80 km/h).

Freight operating companies in conjunction with the Rail Safety and Standards Board should make a proposal to modify the existing arrangements in section 18.3 of module TW1 of the Rule Book, by making this rule applicable to all trains.

(paragraphs 141a, 141b, 143a, 144a and 146b).

Details of steps taken or being taken to implement the recommendation

British American Railway Services in its response of 11 April 2011 explained:

BARS was involved in the work with the Rail Freight Operators group as the RSSB Delegate and will re-join that group so that BARS is involved.

Colas Rail Ltd in its response on 4 April 2011 advised:

The anomaly stated in Rule book module TW1 item 18.3 was addressed when the Rail Freight Operating Group and the RSSB discussed the recommendation in February 2011 and an agreement reached on the appropriate required changes to Rule Book clauses.

The recommended changes were drafted and approved for industry consultation at a TOM SC [Traffic Operation and Management Standards Committee] meeting in March.



Annex A

The agreed amendments will be in the October Rule Book changes (which come into force in December 2011).

The Colas Rail National Freight Delivery Manager and Rail Operations Standards Manager ensure Colas Rail train drivers are briefed on Rule Book changes via team meetings, driver's weekly rostering packs and monthly company briefs.

GB Railfreight Ltd in its response on 6 April 2011 advised:

In respect of recommendations 1 & 3, the RFOG met with the RSSB on 16 February 2011 and discussed the recommendations.

An agreement was reached as to how these Rule Book clauses could be modified to improve the risk control afforded by them. As a consequence of this, the RSSB drafted the proposed amendments and these were presented and approved for industry consultation at the TOMSC 30 March 2011.

The amendments will be in the October Rule Book amendments due to come into force in December 2011.

However, ahead of this, GBRf introduced additional instructions addressing these risks and these were issued in December 2010.

GBRF therefore considers that it has addressed the requirements of these recommendations ahead of the Rule Book amendments being introduced.

The RFOG undertook a great deal of work in relation to both the Carstairs and Carrbridge incidents throughout 2010, the end product being an RFOG Approved Code of Practice.

GBRf provide ORR with copies of:

- GBRf General Operating Appendix, Module A5 'Operation of Freight Services in Winter Conditions'; and
- The Rail Freight Operations Group Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

DB Schenker Rail (UK) in its response on 12 April 2011 advised:

DB Schenker can confirm that, as recommended by the ORR, the respective issues were discussed by the RFOG, over the course of a number of meetings.

The issues were actually addressed prior to the issue of the RAIB report and resulted in the issuing of the first RFOG Code of Practice "Operation of Freight Services in Winter Conditions", which was issued in November 2010, which addresses recommendation 2.

Recommendations 1 & 3 were also addressed with RSSB via RFOG, and as a result amendments to the respective rules will be issued in



Annex A

June 2011 (ORR has confirmed that the rule book changes will come into force in December 2011)

DB Schenker is an active member of RFOG, and the code of practice is heavily influenced by the specific instructions we issued internally during the 2009/10 winter period. In addition the Operations Standards Manager, DB Schenker is the Freight sector representative on the TOMSC, the committee where the proposed rules changes were debated.

Freightliner in its response on 4 May 2011 advised:

The Rail Freight Operators Group met with RSSB on 16 February and discussed the recommendation.

An agreement was reached as to how these rule book clauses could be modified to improve the risk control afforded to them. As a consequence of this, the RSSB drafted the proposed amendments and these were presented and approved for industry consultation at the Traffic Operation and Management Safety Committee on 30 March.

The amendments will come into force in December 2011.

The RFOG undertook a great deal of work in relation to both the Carstairs and Carrbridge incidents throughout 2010, the end product being an RFOG Approved Code of Practice.

Direct Rail Services in its response on 5 May 2011 advised:

DRS has participated in the joint RSSB / RFOG workshop to review section 18.3 of module TW1 of the rule book. The new requirements of section 18.2 will be implemented upon the reissue of module TW1 of the rule book.

Timescale: To be implemented on reissue

RSSB in its response on 11 August 2011 advised:

A proposal was submitted by RFOG (Ref. 10/044) and TOM SC approved continuation of work at the November 2010 meeting. This proposal included the following proposed amendment:

TW2 section 7 - Working trains during snow conditions:

If you are working a train conveying disc-braked vehicles, or a freight train comprising of vehicles fitted with either disc or tread brakes, you must make sure that the speed of the train is restricted to 10 mph below the permissible speed for the train over each portion of the line.

However, you do not need to reduce the speed below 50 mph.



Annex A

On 29 March 2011 TOM SC approved the Rule Book amendments for industry consultation. However, the project plan drew attention to the fact that RFOG no longer wished to propose a mandated limitation of speed, having identified that there was no simple solution to this question. The Project Plan referred to this as follows:

Following further discussions with RFOG representatives

it has been agreed that it is not possible to produce detailed instructions that address all combinations of traction and rolling stock types and geographical features of routes. It is therefore proposed to amend section 18.2 of module TW1 so that this requires running brake tests to be carried out as frequently as necessary to make sure the automatic brake is operating effectively and also to carry out any additional train operating company instructions, which would include any restrictions in speed that are necessary.

This means that questions such as 'frequency of brake tests' the effect of steep gradients and any necessary reductions in speed will be defined by train operators in the light of engineering advice and the knowledge of the routes over which they work.

In June 2011 TOM SC approved the consultation comments and the amendments, which will be published in December.

It would appear that RFOG in association with ourselves did indeed respond to the recommendation by developing a proposal, although in the course of evaluation, it became apparent that the 'blanket' speed reduction envisaged was technically unsound, and that instructions relevant to rolling stock and route characteristics offer a more effective means of controlling risk.

ORR Decision

The ORR, through its attendance at the Rail Freight Operations Group (RFOG), is satisfied that freight operating companies are implementing the RFOG Approved Code of Practice 001 'Operation of Freight Services in Winter Conditions'.

The ORR also attends the Traffic Operation and Management Standards Committee, as an 'observer',

The ORR note that British American Railway Services is not currently operating freight services, but has committed to addressing the recommendation when it is in a position to operate freight trains.

After reviewing all the information received from Colas Rail (UK), GB Railfreight, DB Schenker Rail (UK), Freightliner Group and Direct Rail Services, ORR concluded that, in accordance with the Railways (Accident Investigation and Reporting) Regulations 2005, these companies have:

- taken the recommendation into consideration; and



Annex A

- have taken action to implement it.

ORR will write to RAIB if it becomes aware that the information above is inaccurate.

Status: *Implemented*