Explanations
for the technical assessment

Contents

1. Definition of terms

VERS	VPI European Rail Service GmbH
VPI-EMG	VPI European Maintenance Guide
ECM or ECM I	ECM of management functions I in accordance with ECM certification under Implementing Regulation (EU) 2019/779 (ECM Regulation for short)
ECM II	Maintenance development function ECM II in accordance with ECM certification under Implementing Regulation (EU) 2019/779 (ECM Regulation for short)
ECM III	Fleet maintenance management function ECM III in accordance with ECM certification under Implementing Regulation (EU) 2019/779 (ECM Regulation for short)
Maintainer or ECM IV	Maintenance delivery function ECM IV in accordance with ECM certification under Implementing Regulation (EU) 2019/779 (ECM Regulation for short)
Technical assessment	Inspection of a maintainer by auditors on behalf of VERS (comparable to an audit)
Technical approval	Documented positive result of a technical assessment (comparable to a certificate)
Maintenance/Repair	In the subsequent text, no distinction is made between maintenance and repair. Only the term maintainer (or maintenance) as defined in the ECM Regulation is used.

2. General

VPI European Rail Service GmbH (VERS) prepares and publishes the VPI European Maintenance Guide (VPI-EMG) as a practical recommendation for the maintenance of goods and tank wagons. Further information on the VPI-EMG can be found in the corresponding introductory remarks.

VERS conducts technical assessments to check whether a maintainer is able to perform all or part of the maintenance work listed in the VPI-EMG in terms of organisation, expertise, personnel and infrastructure.

3. Classification of the VERS activities

The ECM Regulation distinguishes between 4 functions. Annex II of the ECM Regulation lists the exact requirements and assessment criteria for the 4 functions.

In the course of ECM certification, functions I–III or I+IV are usually audited for freight wagons. The combination I+IV refers to the certification of a maintainer.

3.1 VPI European Maintenance Guide (VPI-EMG)

The ECM Regulation applies to a large variety of vehicle types (freight wagons, locomotives, railway carriages, etc.) and does not specify any specific maintenance work to be performed for the respective vehicle type. ECM II (maintenance development function) is responsible for creating the relevant maintenance specifications.

With its maintenance recommendations (VPI-EMG), which have been developed and proven by the sector, VERS supports the ECM IIs responsible for the maintenance development function for freight wagons in creating their maintenance specifications.

3.2 Technical assessment

The ECM III responsible for the fleet maintenance management function must have a procedure in place to test the competence, availability and performance of the entities responsible for maintenance delivery in accordance with, inter alia, paragraph 1 of point ‘III. Requirements and assessment criteria for the fleet maintenance management function’ of the ECM Regulation.

VERS supports the ECM III that is responsible for the fleet maintenance management function by conducting specialised technical assessments to verify the competence and performance of the entity responsible for maintenance delivery (maintainer).

4. Technical Assessment

Fulfilment of the requirements and assessment criteria of the ECM regulation and thus successful 'ECM certification' are a prerequisite before a technical assessment is conducted by VERS.

With its technical assessments, VERS checks whether a maintainer is able to perform all or part of the maintenance work listed in the VPI-EMG in terms of organisation, expertise, personnel and infrastructure.

For this purpose, VERS has developed checklists from the VPI-EMG maintenance recommendations to check various maintenance activities. In addition to administrative tasks and activities, the technical equipment as well as the qualifications and skills of a maintainer's employees working in the maintenance area are checked in a specialised technical assessment. The focus here is on maintenance work on wheelsets and brakes, among other things. Besides these component-related inspections, the entire sequence of a freight wagon going through the maintenance workshop is also tracked in main audits and the maintenance result is verified. For these freight wagons, this also includes the implementation of additional or deviating ECM II specifications.

However, the maintenance work described in the VPI-EMG can only rarely be carried out comprehensively by one maintainer. For example, only a few maintainers carry out the refurbishment of all components (such as wheelsets, brake slack adjusters, air shut-off valves, etc.) themselves. There are also mobile service teams that specialise in providing mobile maintenance services, i.e. outside of fixed maintenance facilities. Both can significantly reduce the amount of maintenance work that a maintainer can perform on freight and tank wagons.

Consequently, VERS has decided to limit the technical assessments to the maintenance area specified by the applicant/maintainer in his application and to document it on the technical approval (certificate) and on the VERS website.

Note:

As with any audit, a technical assessment is only a snapshot of a maintainer's activities and skills on the days of the assessment.

5. Instructions for use for ECM I – III

If a maintainer has been technically assessed and approved by VERS, an ECM can assume that this maintainer is a subscriber of the VPI-EMG in its current edition. The ECM may further assume that the maintainer is able to perform all maintenance services approved by VERS.

Irrespective of this, an ECM can check on its own responsibility whether a maintainer can perform additional or more extensive maintenance activities than those specified in the VERS technical approval. Approval for these changes must be granted by the respective ECM. For example, this may be the case with precisely defined conversion projects or maintenance activities not described in the VPI-EMG.

It is the commissioning ECM's responsibility to periodically conduct quality control measures to ensure that the commissioned maintenance work on a freight wagon is performed correctly. The scope and frequency of these quality checks are based on experience.

If it is established in the course of these quality checks that a maintainer systematically ignores relevant points of the VPI-EMG specifications or defies individual safety-critical aspects, each ECM is requested to notify VERS.

6. Instructions for use for maintainers

In addition to a valid ECM certification, a prerequisite for a technical assessment and approval by VERS is that the maintainer is a subscriber of the VPI-EMG. Both are checked by VERS during the application for a technical assessment.

Until the introduction of European regulations for non-destructive testing, maintainers who perform wheelset repairs from IS 1 upwards must have a certification in accordance with the VPI specification NDT Railway from a technically competent authority or another nationally regulated NDT certification of the same safety level as the NDT Railway specification.

Maintainers who wish to conduct inspections or repair accident damage require certification in accordance with EN 15085-2 at classification level 'CL 1' in activity area 'M' for technical approval.

The required evidence and instructions for applying for a technical assessment can be found on the VERS website under:

https://vpihamburg.de/en/vers/assessment-certification/our-services/technical-assessment

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7. Release cycle

The technical assessment begins with the request from the maintainer. The time frame for the main audit is based on the requested scope of services. The dates are discussed and scheduled together with the maintainer. During an initial technical assessment, a main audit is conducted to check whether a maintainer is able to perform the maintenance work requested and listed in the VPI-EMG in terms of organisation, expertise, personnel and infrastructure.

In the subsequent four years, the maintainer must prove in annual interim audits that it is still able to perform the specified maintenance work.

The validity of the technical approval is limited to a maximum of 5 years. In order to uphold the technical approval certificate, the maintainer must apply for renewal in a timely manner. The cycle then starts all over again with a main audit.

Changes to the maintenance scope of the maintainer can be included in the technical approval certificate upon request during an extension audit. This does not affect the five-year cycle.

8. Withdrawal of technical approval

Cancelation of the subscription to the VPI-EMG leads to the immediate revocation of the technical approval certificate by VERS. The same applies to the non-payment of VERS invoices for the VPI-EMG subscription or the technical assessment.

Due to legal requirements, the loss of the valid ECM certification also leads to the revocation of the technical approval certificate. The loss of welding or NDT certifications initially leads to the revocation of the technical approval certificate due to the assumed reduction of the approved scope of services. Whether and for which scope of services a specialised technical approval certificate can be issued must be clarified with VERS. Systematic non-compliance with the VPI-EMG specifications, unless so instructed by the commissioning ECM, as well as individual safety-relevant CV violations lead to the revocation of the technical approval certificate, unless it can be quickly demonstrated that such incidents can be credibly excluded in the future through modified internal processes, controls, etc. The final decision lies with VERS.

9. Authorisation of work on RID hazardous goods tanks

As part of the application for a technical assessment, the maintainer can specify the types of hazardous goods tanks on which he can perform maintenance work. VERS provides this information on its website for information purposes.

During the technical assessment, VERS only checks whether the basic requirements for working on hazardous goods tanks are in place at the maintainer's facility. This applies in particular to health and safety regulations. VERS also checks whether it is possible to refurbish tank wagon fittings. The specialised technical assessment does not comprehensively check compliance with the corresponding maintenance specifications of the tank wagon operators for the hazardous goods tank.

This is attributable to the fact that only a few maintenance specifications for hazardous goods tanks are listed in the VPI-EMG. The vast majority of maintenance specifications are issued directly by the operators of the hazardous goods tanks to the maintainers. Furthermore, hazardous goods regulations such as the RID (Regulations concerning the International Carriage of Dangerous Goods by Rail) stipulate that only appropriately authorised personnel from recognised inspection bodies may work on hazardous goods tanks for certain activities. For example, this applies to the performance of tank tests and issuing welding licences.

10. Authorisation for the cleaning of tank wagon tanks

The approval and operation of cleaning systems for tank wagon tanks are exclusively subject to national/local regulations. The competent authorities are also responsible for checking whether the relevant cleaning systems are properly authorised and operated.

The information on the VERS website regarding cleaning options for tank wagon tanks is therefore based on information provided by the respective maintainer and a brief inspection of the relevant cleaning system as part of the technical assessment.