

From: Elizabeth Parkes [mailto:Liz.Parkes@tie.ltd.uk]
Sent: 22 April 2010 17:10
To: Valentino, Stefano
Cc: Tony Glazebrook; Alastair Richards; Sinead Scott
Subject: Response to consultation of Railway and Guided Transport Miscellaneous Amendments Regulations

Dear Stefano,

Please find attached our response to the consultation document on the Railway and Guided Transport Miscellaneous Amendments Regulations.
Any queries, please don't hesitate to contact me.

Yours,

Liz Parkes
Safety & Standards Manager

Edinburgh Trams
Citypoint
65 Haymarket Terrace
Edinburgh
EH12 5HD



Response to the Railways and Guided Transport (Miscellaneous Amendments) Regulations 2010 Consultation Document

Consultation question	Response
Do you agree that we should not change the current position on the exclusions from ROGS ?	Agree
Do you know of any circumstances in which vehicles registered and	We are not aware of any such circumstances.

Liz Parkes, Safety & Standards Manager

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maintained according to the laws of a non-EU member state enter Great Britain ?	
Do you know of any circumstances in which vehicles with track gauges other than standard gauge enter Great Britain ?	The Edinburgh Tram system uses standard gauge, therefore we are not affected by this. We are , however, aware that some systems falling within the scope of ROGS operate a non standard gauge, e.g. SPT Subway in Glasgow which has a gauge of 1220mm feet, but we are not aware of such vehicles, “entering Great Britain”.
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 ?	We are not aware of any such circumstances.

Consultation question	Response
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. ?	We are not aware of any such circumstances.
Do you agree that RAIB should be the investigating body for accidents on tramways in Scotland.	As the operator of the only tramway in Scotland, Edinburgh Trams, we can see no reason why RAIB should not have jurisdiction. Our incident management and reporting plans have assumed that the legislation would be amended as otherwise, the Edinburgh Trams system would be the only fixed tracked system in the United Kingdom to be covered by ROGS but not the RAIB requirements.
Do you have any comments on the new definitions ?	Agree that definition is needed to include vehicles which don't operate on the main line railway, such as trams.
Do you agreed that these regulations should contain the date	Agreed, however, it should be noted that we aren't affected as this applies to maintenance of vehicles on

by which domestic vehicles should have been registered in the NVR ?	the mainline railway.
Do you have any comments on the proposal to extend the meaning of work to include voluntary work ?	We agree that anyone who carries out safety critical work should have the necessary competencies and fitness, and that the meaning of work should be extended to cover voluntary work. However, we believe that when enforcing the legislation, care should be taken to ensure that voluntary organisations are not obliged to put in place disproportionately bureaucratic and resource hungry competence management systems.
Do you have any other comments to make in relation to the consultation document ?	<p>We would be pleased if we, and our sister company tie, could be formally added to the list of consultees.</p> <p>Edinburgh Trams Citypoint 65 Haymarket Terrace Edinburgh EH12 5HD</p>