



AUSTRALIAN ASSOCIATION OF LIVE STEAMERS

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AUSTRALIAN LIVE STEAMERS SAFETY COMMITTEE

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Mr. George Beavis
Secretary
Bankstown Steam Locomotive Society Co-operative Ltd
PO Box 158
JANNALI NSW 2226

Dear George,

Re: Proposed Amendments to the Code of Practice

I acknowledge receipt of your letter of the 8th March to the Convention Secretary concerning observations and suggested amendments to the revised Code.

We are grateful that some member clubs do take the time to evaluate and respond to the consultation process. We have reviewed your itemized comments, and respond as follows:

1. Gauge Infringement. The CoP (4.8.2.1) did not change any matters in relation to clearances. It is left to the 'arm's length' requirement. If not clear of this then a reduced speed is suggested. In AS3533 Section 3.17 more specific requirements are provided. These are vertically 2.4m above the floor (this is interpreted as the ground for our situation) and 750mm from the outside face or furthest projection of the vehicle. There is an option with slow speed to vary this in accordance with Figure 3.1. However the examples are difficult to relate to a miniature railway situation.

The application of an absolute specific figure is highly likely to be non-compliant by existing installations, nor does it need to be that hard and fast. Risk reduction controls such as reduced speeds, warning to passengers to remain seated, not grab at lineside objects and constant supervision by the guard, together with the low speed are likely to be adequate controls. These can only be assessed in context with the local operation. The ability to be clear about the requirement while remaining flexibility for initiative in application (as noted on the first page of the letter) seems to be currently embodied in the existing wording and thus no change is proposed.

2. As you would no doubt be aware, the motion regarding ages was withdrawn for further consideration. Your point about Operator vs competent person is acknowledged. The term 'Competent Person' will be reserved for the person defined in Section 4.6. The word in 5.2.3 will be proposed to be changed to "Operator". However this does not remove the requirement for such persons to be competent.

Your point about being able to reach controls is a requirement for the supervision of permitting the younger operator to drive. If this could not be done, then the supervision requirement could not be met. It does not mean it could never be met, and where it can, the Code permits the younger driver under supervision.

3. Brakes. It is agreed the wording can be improved. It is proposed to alter 4.2.1 to read "Effective brakes shall be fitted to trains utilized for public passenger carrying". This makes 4.2.2 satisfactory as written. Your comment regarding the wording of 4.1.2 and 4.2.1 is unclear. 4.1.2 deals

specifically with light locomotives. This is a separate and additional requirement to the braking of trains. The implication you mention may or may not be correct, depending on the relative sizes of the locomotive, carriages and the effectiveness of the brakes. Both situations need effective brakes. Some locomotives may not haul a train, especially small gauge locomotives, hence a requirement that they be required to be able to stop a two car train is not generally applicable. No change to the Code wording is thus proposed.

4. In regard to assessment of the degree of compliance with the Code in regard to braking performance, it is up to the individual Society as to how they do this. Each Society's Board is responsible and should have a suitable system in place. In regard to 4.1.1, a mechanical brake (such as a hand brake on a tender) is easily capable of being retained on. Power brakes are usually not fail safe in all respects, and thus it is not considered appropriate to specify a performance level that cannot be generally achieved in practice.
5. Couplings. We agree the stress ratings should be in MPa.
6. We note the suggestion for a comprehensive index. If we can get a volunteer to create this document, it will be incorporated. Is there an individual or a group within your society who would be prepared to undertake this task ?
7. We note your concern regarding the terms continuous and automatic brakes. The meaning used is the same as in the railway industry and is not specific to the AALS Codes. A continuous brake is a brake that can be applied through out the train by operation from the locomotive (or perhaps the guards van). There is no requirement in the code for the brakes to be fail safe.

We will place these proposed changes into the 2010 Consultation Process for further discussion. A suitable motion will be formatted towards the end of the year for presentation to the 2011 AGM.

Thank you for your suggestions. It is only with the assistance of those dedicated enough to review and pass comments on our systems that improvements can be made.

Feel free to contact us at any time to further explore and discuss the above points.

Regards


24/5/10

Warwick Allison, Chairman AALS Safety Committee
Alf Grigg, Secretary, AALS Safety Committee