

IMPORTANT MESSAGE REGARDING CABLE FEATURES: MUST READ

BWSW are distributing this information note, relating to cable features, to all known cable centres in the UK, whether they are or aren't accredited or affiliated to BWSW. The note highlights (i) core legislative requirements in relation to Health and Safety with some practical guidelines; and (ii) some technical information, sourced from publicly available content, relating to the serious dangers represented by POLYPROPYLENE. This is a material which has been used in some features. The information note follows a very serious incident in 2020 which led to catastrophic injuries to a participant.

The information note has been reviewed, and inputted on, by the Health & Safety Executive and reflects what many centres will already be aware of, and adhering to, in their day to day operation. However, given its importance it is being sent in any event, for completeness, to all UK cable centres.

It should not, in anyway, be taken as replacing appropriate risk assessments, emergency action plans, policies, procedures and checks etc that centres already have in place or undertake.

Centres will closely follow the recommendations of manufacturers, suppliers and distributors in relation to the features provided at sites. They have their own obligations under health & safety legislation. Owners will also under applicable health & safety legislation need to ensure that they follow such recommendations at all times and, in particular, ensure regular checks and maintenance as well as operating, at all times, in a safe manner.

Legislation

The Health and Safety at Work etc. Act 1974 and its associated regulations apply to cable centres operated across the United Kingdom. This information note wishes to draw your attention to the following legal requirements.

1. Health and Safety at Work etc. Act 1974 s6(1) and s6(2)

Any person who designs, manufactures, imports or supplies any article or equipment for use at a cable facility must ensure, so far as is reasonably practicable, that the equipment is so designed and constructed that it will be safe and without risks to health at all times when it is being set, used, cleaned or maintained by a person at work or being used by a member of the public.

2. Health and Safety at Work etc Act s2 and s3

The owner/operators of cable facilities have duties under the Health and Safety at Work etc. Act 1974 to both their employees and non-employees (members of the public) to ensure so far as is reasonably practicable the health, safety and welfare of persons affected by their undertaking.

In practical terms duty holders must ensure the following:

- **Designers, manufacturers, importers and suppliers** have a duty to ensure that the features (and other equipment) that they manufacture, supply or import is safe for use when first supplied and includes the provision of suitable and sufficient information to their customers with appropriate information to allow safe use when it is being set, used, cleaned or maintained.

The design and manufacturing process should determine through testing etc, that equipment and the materials used in its construction are suitable for the activity and the environment in which they are to be used. In circumstances where the designer and/or manufacturer does not hold the necessary technical knowledge, they should engage the services of a competent person.

- **Site Operators** who own or otherwise have control of a cable facility must ensure that the equipment used as part of that activity has been subject to suitable pre-use inspection by a competent person, is maintained and inspected at suitable intervals by a competent person and is operated in safe manner.

General guidance

Daily checks and maintenance

The process of pre-use and in-service inspection is important as part of the system to make sure a device is safe. However, these inspections are not enough to ensure that a device is adequately maintained in a safe condition.

Operators are responsible for making sure that additional periodic checks, inspections and maintenance are done so that equipment remains in a safe condition during the period it is being operated

Make sure that equipment has a daily check before the public uses it. These daily checks should be recorded in writing, filed in the operations manual and:

- take account of any instructions from designers, manufacturers, importers, suppliers and inspection bodies.
- list all parts and other matters which need daily checking to ensure safety and describe how they should be checked and acceptance criteria.

Operators must make sure the person doing the daily check is competent to do it properly.

It is good practice to keep records of any relevant training provided. Keep records of daily checks and of any remedial action taken, if possible, for at least three years and in such a way that the records can be examined if needed.

Operators should not open to the public unless a satisfactory daily check has taken place

Operators must also properly maintain and service equipment, and ensure that maintenance work is done:

- by people trained or experienced in the procedures appropriate for that equipment.
- taking account of the manufacturer's instructions and maintenance schedules.

Where they are not specified, seek the advice of a competent person, including where appropriate a Health & Safety Consultant.

Publicly sourced technical Information relating to Polypropylene

Historically, Polypropylene on metal frames has been used in the manufacture or creation of features. It is clear that Polypropylene degrades from exposure to ultraviolet rays which in the event of a collapse can lead to catastrophic and life changing injuries for participants - particularly in the context of metal framed features. The following AI generated commentary is taken from the internet: "PP is susceptible to degradation from ultraviolet (UV) radiation, leading to a loss of mechanical strength and physical properties, such as cracking, discoloration, and embrittlement. PP can be used in some instances i.e., when it is stabilized with additives like UV absorbers and hindered amine light stabilizers (HALS) to reduce its susceptibility to UV damage, but it is generally not considered suitable for use in features etc."

There are a number of manufacturers, suppliers and distributors whose products exclude Polypropylene and use ultraviolet resistant materials. The position of BWSW is that Polypropylene based products are generally not suitable for outside use in the water ski and wakeboarding sector, and we would not recommend their use.

However, if features and other equipment containing polypropylene are used this must be done so in strict adherence with the manufacturer's instructions and under a robust inspection regime to ensure that they remain safe to use throughout their operational life

It is our belief from our interactions with BWSW accredited sites, whom we meet with at least twice a year, that accredited cable centres in the UK operate in a highly conscientious and responsible manner with safety the front and central consideration. As with any physically arduous activity and alongside sports huge contribution to mental health and wellbeing, accidents can happen from time to time despite every effort.

IT WILL FOLLOW FROM WHAT WE SAY ABOVE THAT IN TERMS OF MINIMISING RISK THAT IT IS OUR STRONG RECOMMENDATION IS THAT CENTRES SHOULD NOT PURCHASE OR CONSTRUCT FEATURES USING POLYPROPYLENE MATERIALS.

If you have any questions relating to the above, please feel free to contact Keir Boissevain the BWSW development officer by email [keir@bwsf.co.uk]. Keir will not be able to answer questions on technical issues relating to appropriate materials for features or to give answers on Health & Safety issues, though we do have access to a third party health and safety consultant to whom we can refer you.