

## Traceability of Cow's tails

A member reported: "One of our men was assisting during a rigging job wearing his rope access harness with cow tails and climbing hooks. Before he could start working, he was stopped by the project/platform safety rep. He was being told that he could not use his cow tails because they had no identification numbers on it."

Extract from Irata Guidelines section 9.4:

*There is little point in using certified equipment unless it can be individually traceable to the relevant test certificates or certificates of conformity, and matched to the record of its use in order to facilitate its care properly. Karabiners and other metal items should be indelibly marked in a manner that will not affect their integrity. Metal items should not be marked by stamping, unless by agreement of the manufacturer. Ropes and harnesses etc. could be indelibly marked by various methods, e.g. by marking their identification on a tape, which is then fixed in place by a heat-shrunk clear plastic cover. Lengths cut off a main rope could have the identity transferred to them sequentially; e.g. the number A1 when cut off could be numbered A1/1, A1/2 etc.*

My observation as an Irata auditor: Some users of cow's tails say they do not mark because they are changed each offshore trip [2 weeks] because of arduous conditions. Others say they allow a maximum 6 months use before being taken out of service, so no need to mark ID as all will be less than 6 months. Any other lengths being still uncut on the reel.

I have asked Irata member companies which provide PPE inspection courses for advice:

*SpanSet recommend that as a cow's tail is an improvised item of equipment and not subjected to the same level of manufacturers control as other items of equipment, then it should always be controlled to the highest possible standard. Therefore all cow's tails should be individually marked, examined and traceable, just the like every other item of equipment.*

*The rope used for making cows tail is normally supplied as one length with a batch number on the label and/or instructions. The end user is then expected to cut and assemble their own cow's tails from this one length.*

*How is the batch information transferred to each cows tail made?*

*Whatever the length of service of any item the chain of traceability should always be maintained.*

*In a team of rope access workers where items that look alike and have no markings there is the potential for them to be mixed up. In this case service life could extend over the expected period (whatever that may be) as an item passes from one user to another and therefore any assumed traceability is lost.*

*To justify not marking or controlling these items, the company / end user must have some strict controls to prevent confusion. In this case how would an uncontrolled item be traced back to the manufacturers batch once the item has been dissociated from it's original labelling / batch number? (i.e. cut from a reel of rope.)*

This should lead us to the conclusion that cow's tails require some form of identification.

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It is preferable to mark cut ropes as sub-sections of the original reel or length, which has ID from the manufacturer.

For textile products a record of period of use is required in addition to above.

For Beal Ropes version:

see [http://www.beal-services.info/index3.php?langue=lg2&categorie=cat\\_1](http://www.beal-services.info/index3.php?langue=lg2&categorie=cat_1)

Go to "Establishing traceability", then "How to identify a rope cut" for the ultimate detail

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