Colwall Orchard Group:

Safe Way of Working: SWOW 14 - Use of Trailers

Prepared by: Chris Blake March 2021

Review: Annually thereafter (or in the event of an accident)

Reviewed by: C Blake 8th August 2024

Added section on Water Bowser

Next review: by August 2025

**COG does own ONE Bowser Trailer.**

**Any vehicle and trailer combination used in an authorised activity relating to COG must comply with the relevant Acts and Regulations and take note of the following SWOW.**

**Trailers**

The term “Light Trailers” is defined in the Road Vehicles (Construction and Use) Regulations 1986 (C&U Regulations) as Trailers having a maximum authorised mass (MAM) which does not exceed 3,500Kg.

Trailers up to 750Kg MAM are not required to have brakes. Trailers above 750Kg MAM and up to 3,500Kg MAM must have brakes. Though an overrun system is commonly used, this is not a specific requirement.

The use of heavier trailers within our Orchards should be **discouraged** due to the impact on ground consolidation and the need to have someone who is experienced in the use of such trailers.

**Towing unbraked trailers**

Unless the towing vehicle manufacturer specifies restrictions for unbraked trailers, Regulation 87 of the C&U Regulations will apply. This states that unbraked trailers may only be towed by vehicles having a kerbside weight of at least twice the actual in-use weight of the trailer. However, if the towing vehicle manufacturer specifies a lower weight, this figure must not be exceeded.

**The maximum towing weight or train weight**

This is set by the towing vehicle manufacturer for each specific vehicle model and must not be exceeded. Failure to comply may lead to prosecution on the grounds of roadworthiness, and would also be likely to invalidate the insurance of the towing vehicle.

Observing the account of these limits should be factored in when transporting any goods or items, both within COG related areas and on the public highway.

**Towbars**

All towbars should be installed and maintained in accordance with the vehicle and towbar manufacturers recommendations. Any part of the towbar or load that obscures the vehicle registration plate must be avoided and a suitable corresponding, compliant plate should be fixed and illuminated as required to the rear of the trailer.

**Couplings**

Couplings and towbars must comply with EC Directive 94/20 EC. This is a mandatory legal requirement. It specifies the dimensions etc when mounted on a laden vehicle. It is advisable when carrying out pre-inspections to check for any looseness and rattles as any wear and tear could cause the coupling to detach from the ball.

**Electrical Connections**

Where fitted these should be used and are either of the 7-pin or 13-pin plug type and are for the connection to the towing vehicle’s lighting system. Although not a legal requirement in the UK, at this time, it is advisable to use a system incorporating a rear fog light bypass to disable the vehicle fog light when the trailer is connected.

Direction indicators operating in-use are a legal requirement on all trailers. Therefore an operational tell-tale is required in the vehicle to warn the driver of front and rear direction indicator failure on both the vehicle and the trailer.

**Braking Systems**

Braking systems must be kept in good working order. This will be achieved by following the manufacturer’s recommendations for maintenance and is most important for safe operation of the trailer.

**Breakaway Cables and Secondary Couplings (fitted to unbraked trailers)**

All braked trailers should also be fitted with a safety device to provide protection in the event of the separation of the main coupling. A “breakaway cable” fulfils this requirement.

A Secondary coupling is a chain or cable that is required between an unbraked trailer and the towing vehicle and maintains the connection of the two in the event of separation of the primary coupling. This is a legal requirement on unbraked trailers.

**Speed Limits**

When towing a trailer, a vehicle is restricted to 60mph on motorways and dual carriageways and 50mph on other roads, all subject to what lower limit may be in force.

**Registration plate**

A number plate must be obtained from a registered supplier and must be fitted. This must comprise black letters on a reflective yellow background, the same as the towing vehicle and lit at night. The towing vehicle’s rear number plate may be used for this purpose when towing.

**Rear view mirrors**

It is a requirement to have an adequate view to the rear of the vehicle and trailer combination. Depending on the relative size and shape of the towing vehicle and trailer, additional extension mirrors maybe required.

**Loading**

Loads must be securely tied down or restrained with straps that are of sufficient strength for the purpose. Wherever possible, loads should be evenly distributed across a trailer and positioned in such a way as to keep the nose weight within the recommended limits.

When coupled to the towing vehicle, the trailer must sit level or slightly nose down.

**Trailer maintenance**

Trailers must be regularly serviced and maintained in accordance with manufacturers’ requirements. To comply with the law, the braking and lighting systems must be functioning correctly, the general structure must be sound, and tyres must be in good condition.

Trailers may be used infrequently, so a pre-use check by a competent person is considered to be essential.

Any Trailers found to be defective must be labelled to indicate that it is not to be used and this should be reported to the owner and a COG board member so that the required action can be carried out by the owner to either repair, discard or replace as appropriate.

**Positioning the Trailer**

Ensure that the Trailer is used is of correct length, strength etc, for the intended purpose.  The Trailer must be positioned with care to avoid a risk to others or those using it. There is a possible pinch point between the towing vehicle and trailer when at acute angles.

Plan the activity to be undertaken (including manoeuvring the Trailer into place) before loading or unloading the Trailer.  Choose the location carefully to ensure the safest possible working configuration taking into account ground conditions and slope, the location and the nature of the planned activity.

Ensure the Trailer is used according to manufacturer’s recommendations.

Create exclusion zones around the working area if needed, using suitable signs, cones or lookouts (especially if workers are dispersed around the site, the site is open to the public or there are vehicles operating in the vicinity).

**Working with the Trailer**

Any task involving working with Trailers should be supervised by a competent person, who is:

* capable of instructing volunteers in the safe use and
* able to supervise and monitor the activity.

Trailers are only to be used by people who feel confident and physically capable of using them. Lone working when loading and unloading should not be allowed when manual handling implications exist from both heavy trailers and loads.

Users must be wearing appropriate sturdy footwear with good grip, and their clothing should be snug fitting without any obvious snagging points.

**Towing Liquids in the Bowser**

It is important to understand the dynamic nature of liquids when moving and stopping. If you have a partial load then this can lead to slop and slosh which will move the centre of balance and possibly lead to an unstable load. To avoid this either a full load or an empty bowser should be used as there is only one tank space and no complete / further baffle system in place. Caution is the watchword and the need to understand that 1000 Litres of water equates to ONE metric tonne. Check your capacities and vehicle towing load for compliance. Sections relating to uneven ground when working off road or inclines need to be considered to prevent runaway or tipping.

**Incidents**

Incidents likely to lead to damage to the trailer or towing vehicle (e.g. collisions, falls etc) must be reported to the Owner and a COG Board member who should ensure that the safety of the Trailer is checked prior to further use.

Defective Trailers should be removed or clearly marked to prevent further use on site and reported to the Owner and a COG Board member so that they can take the appropriate action.

Any accidents or near misses must be entered into the Accident book.

**Further Information**

Please also refer to

1. Any available COG Site Based Risk Assessments for the site being visited
2. HSE – Workplace Transport Safety (INDG199)
3. SWOW15 - Off Road Driving