



Caledonia House
1 Redheughs Rigg
South Gyle
Edinburgh
EH12 9DQ

Tel: 0131 625 4404

E-mail: hq@scotsac.com

Website: www.scotsac.com

British Standards Institute
389 Chiswick High Road
London
W4 4AL

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Ref: BS EN 1968:2002 and BS EN 1802:2002

Dear Sir/Madam

On behalf of the members of the Scottish Sub Aqua Club I write to express our opposition to the proposals to change the timescale for testing compressed air cylinders from visual testing every 2 ½ years and hydrostatic testing every 5 years to a visual test annually.

Please therefore consider the following comments.

- Where and what is the evidence that the current testing regime needs to be changed?
- Given that the time taken to carry out a visual test will be the same whether it is 2½ years or annually, then the cost to recreational divers and associated businesses will increase several fold.
- Consequently there will be a knock on effect in terms of diving tourism and on diving clubs who already have to work very hard to maintain memberships.
- The additional removal of valves in order to carry out visual inspections will surely have a detrimental effect on the valve in the long run and will therefore be counterproductive in terms of safety and....
- Will also add to the cost with valves potentially being replaced more often.
- The geography of Scotland is such that with the best diving in remote areas, individual divers and clubs need to own a number of cylinders, yet with a short summer season these cylinders may each be used and refilled only a few times in the year, and that the cost of annual testing would be an unjustified and disproportionate increase in the costs of ownership, which are already significant even under the existing testing regulations.

Yours faithfully

Edna Ewan
Scottish Sub Aqua Club Chair