

Draft Code of Practice: Safe work on Roofs, Commercial and Industrial Buildings

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Section/ Figure/ Table	Pg	Para	Line	Reason for change	Recommended changes
2	4	5	3	The code of practice should apply to the maintenance of plant and equipment that is installed on commercial and industrial buildings.	Add: D) applies to the planning, preparation and conduct of work for the maintenance of plant, equipment and gutters and other roof mounted equipment.
2	4	8	5	AS/NZS1657-1992 (walkways, platforms, guardrails, ladders and stairways etc.) is relevant to the code of practice since equipmentspecified in the Australian Standard is constantly used for access, egress and maintenance. This is referred to in Section 5.2.3 Guardrail Systems. Many permanently installed guardrail systems are governed by this Australian standard.	Add: G) AS/NZS1657-1992 fixed platforms, walkways, stairways and ladders – design, construction and installation.
3.2.1	8	1	8	Specify that appropriate control measures are selected in accordance with a hierarchy of control.	Add “in accordance with the hierarchy of control”.
3.2.2	8	2	2	The hierarchy of control as presented essentially consists of two stages ie. A) elimination and B) minimization. The process and hierarchy to be followed are not clear. I am proposing the hierarchy of controls under consideration for the National Code of Practice.	Change the hierarchy to read as follows: A) Eliminate the risk (eg. work off the ground or solid construction) B) Introduce passive fall prevention devices eg. guardrails, scaffolding, safe working platforms. C) Use work positioning to contain the person in a position where they cannot fall. D) Use fall arrest equipment to limit the distance that a person may fall. E) Adopt administrative controls such as safe work practices, training and instruction.
3.2.4	9	1	1	The description proposed for planning by the designer is prescriptive. I suggest a hierarchical approach consistent with section 3.2.2.	Add to first paragraph: “in accordance with a hierarchy of controls”.
3.2.4	9	1	1	There is a perception in the marketplace that aesthetics and heritage issues supersede the hierarchy of control when	Add: “The provision of a safe workplace is of primary importance

				selecting an appropriate control measure. It is necessary to state that aesthetic issues do not supersede OH&S issues and that this is not a justification for selecting lower order level controls.	and this supersedes aesthetic and heritage issues when considering appropriate controls.”
3.2.7	12	1	2	It's not clear that the hierarchy of controls is to be followed in selecting an appropriate control.	State that the hierarchy of controls should be followed when preparing for work to commence.
4	14	1	5	Consideration should be given to the routine maintenance of plant and equipment that is mounted on roofs. It appears that consideration is only being given to a building / construction environment and this should also be relevant to maintenance.	Add: C) The frequency of access for routine maintenance and the provision of permanent access eg. staircases, ladders and walkways.
5.1	14	1	1-7	This three-part statement appears to be the hierarchy of controls currently in force. It doesn't adequately deal with all the control measures that are available for safe work at heights. 1) It does not take into account the elimination of risk by relocation of plant and equipment or encouraging the construction and work to take place at ground level. 2) Point iii does not differentiate between work positioning (fall restraint) and fall arrest. It is accepted in industry that maintaining a position of work where a person cannot fall is preferable to a situation where a person's fall is arrested. It is also accepted that when a person's fall is arrested, injury may result and it's necessary to execute a speedy rescue. It is necessary to differentiate between the two vastly different approaches. 3) In some instances, it may be necessary to work off ladders for tasks of very short duration and where other measures are totally impracticable. Under these circumstances, it's preferable to work off a ladder and to use administrative controls and instruction to control the risk. No mention is made of these controls and they should be included.	Change the hierarchy of controls to follow the hierarchy of the National Code of Practice as follows: A) Eliminate the risk (eg. work off the ground or solid construction) B) Introduce passive fall prevention devices eg. guardrails, scaffolding, safe working platforms. C) Use work positioning to contain the person in a position where they cannot fall. C)Use fall arrest equipment to limit the distance that a person may fall. F) Adopt administrative controls such as safe work practices, training and instruction.
5.2.3	17	7	3	AS1657-1992 governs the construction and installation of permanently installed guardrails and should be referenced in this document.	Figure 4. indicates the use of a guardrail system constructed to AS1657-1992 (walkways, platforms, guardrails, ladders and stairways etc.)

5.3.1	18	2	2	<p>There is a perception in industry that safety mesh is provided underneath Laserlite, alsynite and asbestos roofs to provide safety for maintenance personnel working on the roof well after the construction process is complete.</p> <p>The integrity of the safety mesh has generally been compromised at this stage, since penetrations have been made for the installation of air conditioning, ducting, access hatches etc. The mesh is not repaired and reinstated to the Code of Practice and certainly doesn't provide adequate fall protection after the Laserlite, alsynite and asbestos has become brittle. A statement should be made to clearly state that this perception is incorrect and that a safety mesh is not adequate protection for maintenance purposes.</p>	<p>Add: "Safety mesh is provided for safety during the installation of roofing material. It is not intended to be a safety barrier or control for ongoing maintenance."</p>
5.4.1	21	1	3	<p>Suspension trauma can result in death and this should be stated to emphasise the need for speedy recovery.</p>	<p>If suspended too long in a harness, see 5.4.8 "will result in a fatality".</p>
5.4.8	24	3	4	<p>It is likely that if a fall is arrested, the person will sustain an injury. It is also likely that the person will be in some sort of state of shock and is unlikely to be able to think and act in a coherent and rational manner under these circumstances. Whilst pumping the legs is technically possible, it is unlikely that a person in this state will be able to do this. Including this recommendation as part of an emergency rescue plan may mislead users of the systems into a false sense of comfort. I recommend that reference to this process is deleted and that greater emphasis is placed on the necessity to have a site-specific rescue plan, appropriate equipment and a second person on site to execute the rescue.</p>	
6	24	2	3	<p>It is impractical and virtually impossible to provide a restraint system when working on top of a brittle surface due to the pendulum effect. I suggest controls are recommended in accordance with a hierarchy of controls and that, in the first instance, the risk is eliminated by providing a stable work platform and guardrail (eg. a walkway with guardrail leading over Laserlite or asbestos roofing). Whilst signage is commonly used, this is an administrative control and the way that it is included in this section appears that it is a primary and adequate control. Rather, recommend solutions in accordance with the hierarchy of controls.</p>	

7	25	1-3	All	With working at heights, the risk presented by asbestos cement roofs is the fall hazard. The means of control for working with asbestos is documented in other legislation and rather than elaborate on this, refer the reader to that legislation.	Delete Section 7.