



Walking on air?

Carl Sachs* presents a quide to crossing skylights and asbestos roofs.

ccessing a roof safely and in compliance with the law is rarely as simple as strapping on a harness, particularly when the roof is made from asbestos or has skylights.

Fall prevention regulations and codes of practice stipulate the controls that should be used to address height safety risks and which of them should be used first whenever practicable.

To keep it simple, this article will outline the five-level Victorian hierarchy, which presents the most literal approach to working at heights. It prescribes: Level 1 involves the elimination of the hazard altogether. To achieve this, building owners could relocate plant and equipment away from fall hazards, which is feasible for small split air handling units.

If level 1 is not practicable, then Level 2 calls for a passive fall prevention device, such as a catwalk or walkway, to eliminate the hazard presented by the non-load bearing material and guardrails on the side to prevent anyone stepping off the walkway. Alternatively, an elevated platform can be used to clean the gutters providing this can be done without introducing other hazards, such as overhead cables. Skylight covers are also considered a practicable solution.

If Level 2 isn't practicable, then turn to Level 3. Work positioning systems, such as roof anchors or static lines, require a high level of user skill. They also demand ongoing involvement by the controller of the workplace in the form of training, regulating access, ongoing risk assessments and ongoing consultation with employees and contractors. Level 3 controls will not prevent a fall through the surface and are impractical in these situations, making them effectively Level 4 controls.

Level 4 controls include fall arrest systems like tested and certified safety mesh or safety nets, roof anchor systems and static lines. The use of Level 4 controls acknowledges that injury is almost unavoidable in the event of a fall but aims to save lives.

The workload associated with Level 4 controls is also problematic. Apart from the ongoing responsibilities of training and so on of Level 3, the controller of the workplace is responsible for emergency rescue procedures, including the cost of a



A walkway keeps workers off a potentially brittle roof.

second suitably trained person on site at all times and the necessary equipment. New issues arise too, for example, whether the size of the access hatch or door is adequate for a person in a stretcher.

If Level 4 isn't practicable, then, as a last resort, Level 5 controls such as signage or training would be used. An example of this in the case of Laserlite or asbestos would be signage such as "Beware – brittle surface" or an induction process that highlighted the site-specific hazards and the absence of other control contractors.

Why not use roof anchors?

First of all, asbestos fibres should not be disturbed either by people walking across the roof or by the installation of an anchor.

Second, skylights and asbestos are considered brittle surfaces unless there is certification that proves they are trafficable. Safety mesh underneath does not make a brittle surface safe.

Mesh installed as a part of the roofing process is purely intended to protect the roofers from a fall hazard under the NSW Code of Practice for Safe Work on Roofs – Part 1 and the Victorian Code of Practice for Prevention of Falls in General Construction.

If if is to be used as a fall arrest system in NSW, either a test certificate issued by a NATA-registered or equivalent testing authority or evidence from the manufacturer that it complies with the Australian

Standards is required. Similar requirements apply in Victoria.

In practicable terms, this documentation is rarely available in existing buildings, and an engineer is unlikely to certify the structure retrospectively and cost effectively. The integrity of the mesh is affected when penetrations are made (for the installation of air conditioning systems, extractors, or hatches for example), which make the engineers task more difficult. It is almost impossible to establish the tensile strength of the wire without costly testing.

Even when the documentation is available, wire mesh is at very best a Level 4 control. Since Level 2 controls such as walkways, guardrails and skylight covers are certainly practicable to install for safe access, Level 4 controls are effectively precluded.

As a added bonus, when Level 2 controls are used in Victoria, the controller of the workplace is exempted from the OH&S (Prevention of Fall) Regulations 2003 if the controls complied with AS1657-1992 and the BCA and are used for the purpose intended.

This is a significant incentive because it guarantees compliance and reaps huge savings over the long term.

*Carl Sachs is a director of Workplace Access & Safety, 1300 552 984. Email your height safety questions to sales@workplaceaccess.com.au

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