

Submission received from



in Christchurch at the public meeting
24.10.12.

anthony@heightsafenz.co.nz



Office of Hon Kate Wilkinson

MP for Waimakariri
Minister of Conservation
Minister of Labour
Minister for Food Safety

Associate Minister of Immigration

30 JUL 2012

Managing Director
HeightSafe NZ

Dear

Thank you for your emails of 8 June and 5 July 2012 regarding ladder safety within the workforce. I apologise for the delay in responding.

Too many New Zealanders are harmed or killed at work. There were 41 deaths reported to the Department of Labour, now the Ministry of Business, Innovation and Employment (the Ministry) last year and hundreds of people were seriously injured. The financial cost to New Zealand's economy is estimated to be in excess of \$1 billion a year, while the human price paid by workers, their families and communities is immeasurable.

Falls from heights of three metres or less off roofs and from ladders account for most of the serious harm accidents reported to the Ministry from the construction sector. More injuries happen on residential building sites than any other workplace in the construction sector.

Preventing falls from height is a priority for the Ministry and it expects employers and self-employed contractors with staff working at height to actively manage this significant hazard.

The Ministry's *Preventing Falls from Height* campaign is part of the Construction Sector Action Plan. It aims to reduce harm by raising awareness about the safe use of ladders and safe working on roofs.

While I am unable to meet you to discuss your product, I am referring your email to the Ministry to contact you. Project Team Leader for Harm Reduction—Falls from Height Project, will be contacting you to discuss your product. His contact details are phone

Thank you for writing.

Yours sincerely

Hon Kate Wilkinson
Minister of Labour

cc:

Team Leader, Harm Reduction
Business Support Labour Group

Heightsafe NZ
PO Box 8533
Christchurch
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14 April 2008

Department of Building and Housing
Level 6, 86 Customhouse Quay
PO Box 10-729
WELLINGTON

Attn:

Dear Sir

LADDER SAFETY – HEIGHTSAFE NZ - LADDER BRACKETING SYSTEM

Thankyou for your previous correspondence in relation to the above.

I highlight our real concern with the Building Code in respect of trades people and the use of maintenance ladders for access onto roofs. As per my e-mail to you dated 24 January 2008 I reinforce the significance of making a safer work place for trades people.

Further to your e-mail dated 25 January 2008 you have suggested that we provide specific wording and general requirements for temporary maintenance access. After a recent meeting with Christchurch City Council Solicitors I am now happy to provide you with our proposed amendment to the Building Code.

On advice received, we believe that rather than a change being made to D1 of the Building Code, the more relevant section to amend would be F4 (safety from falling). We believe at present, there is nothing in F4 that safeguards against accessing heights, rather the only protection you receive is when you are at a height.

The following indicates the changes to the Building Code that we put forward:

Performance Criteria:

Buildings with services on roofs that require regular maintenance shall have permanent fixings to allow for safe ladder access from a lower level to height.

Limits of Application:

Shall only apply to commercial buildings where ladders are the only means of access from a lower level to services at height.

We believe that such an amendment falls directly within the objective of F4 being 'to safeguard people from injury caused by falling'. In addition the functional requirement that buildings shall be constructed to reduce the likelihood of accidental fall is also satisfied in relation to the changes supported.

We recognise that the term 'services' in our performance criteria may require further definition. We considered using the term specified system as an alternative but believe that it should not be limited to specified systems in the compliance schedule (s103 Building Act 2004) as this will not take into account common services found on roofs such as refrigeration.

We have further considered adding the phrase 'in relation to ladder safety guidelines' to the performance criteria. However we acknowledge that it may be preferable to have this removed and dealt with as an acceptable solution. Your advice on this point would be very much appreciated.

Thankyou for your time in considering what we believe is an essential change to the Building Code to promote safeguarding people from injury caused by falling.

Can you please advise of the relevant process and likely timeframes here forward.

If you have any queries and concerns please do not hesitate to contact me.

Yours faithfully

HEIGHTSAFE NZ