

Council of Construction Associations
#138 - 5751 Cedarbridge Way, Richmond, B.C. V6X 2A8
Telephone (604) 241-7667
email: grant.e.mcmillan@gmail.com
Grant McMillan, President

COCA Update on WorkSafeBC Activities #524 December 6, 2011

COCA Successful in Suspending Regulation Conflict

Following a discussion with a COCA member, COCA requested WorkSafeBC to resolve an inconsistency between the WorkSafeBC Regulation and the CSA Code of Practice. The issue has now been successfully resolved.

The specific issue was the requirement for guardrail heights on system scaffolding.

Most scaffold systems in all industry are built to the CSA guideline (CSA Code of Practice for access scaffold; Z797-09; 5.12.3 Guardrail components (shown below)).

This affects hundreds of scaffold systems throughout BC – not just in construction.

This inconsistency impacts on many industries that use system scaffolding, including pulp mills, shipyards, oil refineries, chemical plants and many others.

The CSA Code of Practice has been widely followed by manufacturers of scaffold systems and is in widespread use in BC and elsewhere in Canada.

The problem is that the CSA Code of Practice recommends a top rail height of 39 inches, plus or minus 3 inches. According to the CSA, a top rail could be as low as 36 inches.

WorkSafeBC Regulation 4.54 requires a top rail height of 40 to 44 inches.

The adaption of the existing, CSA Code compliant stock of scaffolding to the WorkSafeBC Regulation standard would be costly as well as impractical.

After a request from COCA and a series of discussions, WorkSafeBC wrote a Vice President Directive and issued a Guideline that permits the use of the CSA or ANSI standard for the guardrail top height requirement.

An excerpt from Guideline G4.55 (Guardrails on work platforms) is printed below.

WorkSafeBC is of the view that the CSA and ANSI standards provide acceptable guardrail specifications for pre-manufactured metal scaffold systems. Employers should have the choice of using these platforms with top rails of guards at heights ranging between 36 and 45 inches, as permitted in the standards. An amendment to the *Regulation* is being sought to bring consistency between the definition of guardrail under section 4.55 and the specifications in the CSA and ANSI standards for pre-manufactured metal scaffolding.

VP Directive permits 36 – 45” top guardrails on work platforms

Until Regulation Review is completed, employers and other workplace parties will be permitted to use pre-manufactured metal scaffold systems with guards having top rails ranging in height from 36 to 45 inches above the work surface. To provide for this, the Senior Vice President of Workers and Employer Services of WorkSafeBC has issued a Directive by authority of section 188(4) of the *Workers Compensation Act*. It directs officers to not apply section 4.55 as it pertains to the height of top rails of guards on work platforms covered under section 13.2(1)(a) only. Officers will be inspecting to ensure that work platform guard top rails on pre-manufactured scaffolding meet either the CSA or ANSI standards, namely that they are between 36 and 45 inches above the work surface.

This will avoid the potential for hundreds of scaffold systems being declared in violation of the WorkSafeBC Regulation.

In addition, as noted in the Guideline, this issue has been forwarded to WorkSafeBC Regulation Review and added to their work plan.

Excerpt from WorkSafeBC Regulation and CSA Code of Practice

WorkSafeBC Regulation

4.54 Definitions

In sections 4.54 to 4.63

"guard" means a protective barrier around an opening in a floor or along the open sides of stairs or a ramp, landing, balcony, mezzanine, raised walkway or any other area to prevent a fall to a lower level, or inadvertent entry into a dangerous area;

"guardrail" means a guard consisting of a top rail 102 cm to 112 cm (40 in to 44 in) above the work surface, and a midrail located approximately midway between the underside of the top rail and the top of the toeboard, if one is provided, or the work surface if no toeboard is provided.

CSA Code of Practice for access scaffold Z797-09

5.12.3 Guardrail components

Guardrails shall consist of

(a) a top rail securely installed at the height determined by the authority having jurisdiction or, in the absence of such a requirement, at a height of 1.0 m \pm 75 mm (39 in \pm 3 in) above the platform level;