



Working at Height Association

Reaching new levels in safety

TECHNICAL BULLETIN

PPE & Australian Standards

Date of Issue: 25th August 2021

Version 3

WAHA-TB-003.03

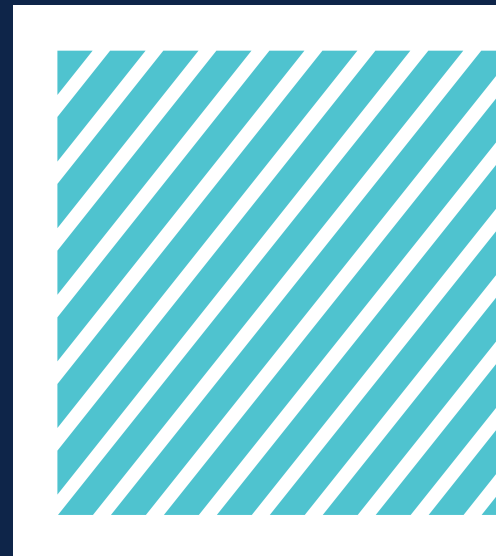
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WHILST ALL CARE HAS BEEN TAKEN TO PREPARE INFORMATION THAT IS FACTUAL AND IN ALIGNMENT WITH ALL FEDERAL, STATE AND TERRITORY LEGISLATIVE REQUIREMENTS, THIS DOCUMENT SHOULD NOT BE RELIED ON SOLELY AS A PRESCRIPTIVE GUIDELINE. ALL ERROR AND OMISSION ARE EXCEPTED.



Technical Bulletin

PPE & Australian Standards



OVERVIEW

This Technical Bulletin has been prepared by The Working at Height Association to clarify the requirement to use Australian Standard certified products in the INDUSTRIAL FALL ARREST market in Australia.

It needs to be made clear that this clarification refers to the INDUSTRIAL fall arrest market and does not cover the recreational climbing market or the specific market exclusions detailed in the Australian Standard (see below).




AUSTRALIAN STANDARDS

The development of an Australian Standard is a long and expensive process and the required investment cannot be undertaken without a significant amount of justification from the industry, the regulators and Standards Australia.

Where the requirement justifies the time and expense, Standards Australia assemble industry experts representing all the stakeholders in the particular market – manufacturers, users, regulators, industry groups etc. - and form a working committee. The composition of the committee is detailed at the start of the Standard document.

In the fall arrest industry, this working committee (SF015) was tasked to develop consensus on the MINIMUM STANDARD of equipment design, manufacture, test and use, to ensure a satisfactory level of safety of those required to work at height in INDUSTRY – and to publish that consensus as an Australian Standard.

Note:- All those involved in the industry have the opportunity to be represented on the Standards Committee and to comment on drafts issued for public comment to ensure their voice is heard. The final published Standard is therefore the result of consensus in the whole market.



HOW TO IDENTIFY AUSTRALIAN STANDARD FALL ARREST PRODUCTS

To exhibit compliance with these industry derived Australian Standards, equipment manufacturers complying with the standard are required to label each individual product. That labelling is required to display the independent certification of the compliance of the labelled product to the Standard.

This labelling – which should clearly show the licence number of the certifying authority - allows the user to confirm the product complies with product design, type testing, and ongoing production validation testing of the Standard.

It is critical that users check the labelling and *avoid* products that use terms such as “conforms to ASNZ S18791.1” or “designed in conformance to ASNZS 1891.1” as declared conformance **does not mean** the product has been certified.

The labelling is also required to display the product date of manufacture and serial numbering that allows complete traceability of each individual component used to make the Australian Standard product.

If any of this information is NOT included AND the user wishes to operate under the protection offered by ASNZS 1891.4, the product should be removed from service.

It should also be clearly understood that there is no requirement for the manufacture of the product to Australian Standards to be undertaken in Australia.

Many international manufacturers wishing to access the Australian market have made the investment to design, produce, test and certify and correctly label fall arrest equipment to Australian Standards.

These products are welcomed and accepted in the Australian market.



ABOUT AUSTRALIAN FALL ARREST EQUIPMENT STANDARDS

ASNZS 1891.1

ASNZS 1891.1 is the “equipment manufacturers” standard for harnesses and ancillary equipment (lanyards, pole straps etc.) and is described in the Standard as:-

This Standard specifies requirements for the materials, design, manufacture and testing of harnesses, lanyards, pole straps and associated equipment including connecting devices and personal energy absorbers for industrial restraint and fall arrest purposes.

Personal protective equipment designed for the following purposes is not covered by this standard:

- Pole top rescue
- Theatrical flying
- Rescue operations
- Emergency services

Recreational fall arrest equipment is neither included nor specifically excluded in the Standard – but is generally not considered for industrial use.

ASNZS 1891.4

ASNZS 1891.4 is the “users” standard. This Standard specifies requirements and sets out recommendations for the selection, safe use and maintenance of industrial fall arrest systems and devices based on the use of safety harnesses, horizontal lifelines and rails, fall arrest devices, and associated lanyards, connectors, anchorages and fittings as follows:-

- There follows details on selection, use and maintenance – all relating to products manufactured to comply with ASNZS 1891.1.
- User compliance with AS/NZS 1891.4 is dependent on the use of product manufactured to AS/NZS 1891.1.

AUSTRALIAN STANDARDS AND THE LAW

Australian Standards are not legal documents – they define the minimum acceptable standard of equipment design, manufacture, test and use as set by the industry, including the regulators, for industrial fall arrest purposes.

The prime legal concern with industrial working at height activity is seen as duty of care and full compliance with the Workplace Health and Safety Act and Regulations. The Act and Regulations operate as part of the legal system and in the working at height arena, they are supported by a number of Codes of Practice.

The Codes of Practice advise that: *“Codes of Practice are admissible in court proceedings under the WHS Act and Regulations. Courts may regard a code of practice as evidence of what is known about a hazard, risk or control and may rely on the code in determining what is reasonably practicable in the circumstances to which the code relates. Compliance with the WHS Act and Regulations may be achieved by following another method such as a technical or industry standard if it provides an equivalent or higher standard of work health and safety than the code.”*

It should be noted that the manner in which an Australian Standard is produced makes it the accepted technical and industry standard, as well as the Australian Standard.



AUSTRALIAN STANDARD FALL ARREST PRODUCTS VS FALL ARREST STANDARDS IN OTHER REGIONS

The design, manufacturing and testing standards as specified in ASNZ S1891.1 are globally acknowledged as being more severe than other common standards – CE / ANSI etc.

This does not mean that products made to those other standards do not offer a good level of safety, but the technical requirements within those standards means that they do not offer a level of safety “equivalent or of a higher standard” than the Australian Standard.

'Foreign manufacture' does not relate to ASNZS 1891.1 and many products properly certified to ASNZS 1891.1 are made overseas. Place of manufacture is irrelevant. ASNZS 1891.1 is not a barrier to trade and the Australian Standards organisation would not operate outside the national legal framework.

If a user makes a decision to use a product that is not certified to Australian Standards, there is an inherent risk should there be a reportable incident. Legal action used to be in the Industrial Court but would now be in the Criminal Court under the Australian WHS Act and Regulations.

If equipment failure was deemed to have contributed to the accident or the severity of the resulting injury and an Australian Standard product had been by passed in favour of another standard, the person conducting or business undertaking (PCBU) would be required to prove that the other product offered an equivalent or higher standard than the Australian Standard product. This could involve the authority testing the product involved to the Australian Standard.



SUMMARY

The 1891 series of standards offers a high level of safety to users of working at height equipment. Where manufacturers' – overseas or Australian – claim that their products are of equivalent standard, it would seem reasonable to expect that they should make the investment to prove their case and test, certify and label their products to the requirements of the standard.

As previously highlighted, many Australian and overseas manufacturing facilities have already undertaken that activity and now successfully promote their products into the Australian market without causing confusion amongst end users as they are labelled as certified to Australian standards.

In the industrial fall arrest market, end users should not allow themselves to be persuaded to deviate from correctly certified and labelled Australian Standard products. Those standards have been developed by the Australian and New Zealand industry to set a minimum standard of safety for people working in Australia and New Zealand.



ADDITIONAL INFORMATION

For any additional information, please refer to other Technical Bulletins on the WAHA website. Please use the links on this website to contact your Member Company of choice at:-

www.WAHA.org.au

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