Compliance code
Demolition
Response to public comment

Edition 1

May 2018
Summary of public comment and WorkSafe’s response

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Introduction
Compliance codes (codes) provide duty holders with practical guidance on how to comply with their legal requirements under the *Occupational Health and Safety Act 2004* (OHS Act) and *Occupational Health and Safety Regulations 2017* (OHS Regulations).

While the guidance provided in a compliance code is not mandatory, a duty holder who complies with a compliance code will – to the extent it deals with their duties or obligations under the OHS Regulations – be considered to have complied with those duties or obligations.

WorkSafe Victoria (WorkSafe), in consultation with stakeholders, reviewed existing codes of practice, compliance codes, and non-statutory guidance which informed the drafting of eight proposed codes that were released for public comment from 1 May to 9 June 2017.

**Proposed codes released for public comment in May to June 2017:**

- Compliance code: *Hazardous manual handling*
- Compliance code: *Hazardous substances*
- Compliance code: *Plant*
- Compliance code: *Confined spaces*
- Compliance code: *Demolition*
- Compliance code: *Excavation*
- Compliance code: *Facilities in construction*
- Compliance code: *Noise*

The codes were drafted to ensure they reflect modern work practices, hazards and risk controls and provide practical guidance on how to comply with duties in the OHS Act and the OHS Regulations.

This document summarises the matters raised in public comment submissions and WorkSafe’s responses to these, including how they have informed the completion of the compliance code: *Demolition* (code).

Consultation
WorkSafe established a Construction Stakeholder Reference Group (SRG) to support the review of the compliance code: *Demolition* that aligns with the OHS Regulations (Appendix A).

The group comprised of employee and employer representatives drawn mainly from WorkSafe’s established Health and Safety Stakeholder Reference Group.

WorkSafe undertook a significant amount of stakeholder engagement in reviewing the proposed codes, with more than eight hours of face-to-face engagement with stakeholders over four meetings for the three construction codes.

The WorkSafe website ([worksafe.vic.gov.au](http://worksafe.vic.gov.au)) and a dedicated consultation website ([consultation.worksafe.vic.gov.au](http://consultation.worksafe.vic.gov.au)) provided the Victorian community with information on the proposed codes. A dedicated email address was also set up to provide a channel for SRG members and the public to seek further information or clarification from WorkSafe.
Summary of public comment and WorkSafe's response

Public comment
The code was one of eight proposed codes released for public comment from 1 May to 9 June 2017. WorkSafe received 29 public comment submissions during this time (Appendix B). Three of these public comment submissions included matters specific to the code.

Summary of changes made in response to public comment
WorkSafe has considered all comments received. A comprehensive response to public comment received and any changes made as a result are listed under ‘Specific comments and responses’.

As a result of the review process and comment raised by respondents, amendments have been made to the code, where appropriate.

Overarching changes to all compliance codes in response to public comment
There were a number of comments received which are relevant to the content of all proposed compliance codes. The following summarises these comments and WorkSafe’s response.

Consultation
There were comments received that as consultation is so important to health and safety, there should be more references to an employer’s duty to consult with employees embedded throughout all codes.

There were requests to be more precise about when it is a legislative requirement for employers to consult with employees (eg when making decisions about risk control measures). There were also requests for reminders at appropriate points in the code where employers have a duty to consult with employees.

As a result, amendments have been made to the consultation section in the ‘Introduction’ of each compliance code so it clearly reflects the law. There have been further references to the duty to consult added to most codes, including adding a breakout box on consultation to relevant parts such as sections on risk controls. A breakout box on consultation has been added to Part 5 of this code.

Information, instruction, training and supervision
There were comments received that the duty to provide information, instruction, training and supervision needs to be described within the codes to make it clear when it is a legislative requirement and that the description of this duty needs to be consistent with the language of the legislation.

Information in the introductory section on ‘Information, instruction, training and supervision’ has been rewritten and further references to this general duty have been checked for accuracy and revised where necessary to clearly reflect the law.

Language framework
There was strong feedback in several comments received which requested the existing language framework be amended within all proposed codes. In particular, it was suggested that using ‘should’ as advisory language in a code could be misconstrued by Victorian duty holders as an optional course of action rather than an action which is critical to safety and necessary to achieve compliance with legislative requirements.
Summary of public comment and WorkSafe’s response

There was also a comment that suggested the language framework was potentially confusing as it appeared to reference mandatory requirements where no such legislative requirements exist. There were suggestions that each term within the codes which related to language needed to be considered (ie each line of content within a code) to ensure it was accurate.

As a result, WorkSafe carefully considered the language framework (must, should, may) used in codes and whether the framework should contain stronger language such as ‘need(s) to’ as advisory language.

WorkSafe consulted with stakeholders in considering proposals to amend its language framework within codes to include stronger language. After careful consideration and stakeholder consultation, WorkSafe has agreed to amend its language framework in codes as follows:

- **must** – to indicate a legal requirement that has to be complied with
- **need(s) to** – to indicate a recommended course of action in accordance with duties and obligations under Victoria’s health and safety legislation
- **should** – to indicate a recommended optional course of action.

The amended language framework of ‘must’, ‘need(s) to’ and ‘should’ has been implemented in the code.

There were also several comments raised which highlighted instances of the use of the term ‘should’ rather than ‘must’ where there was a legal requirement which had to be complied with.

As a result, a review of all key language terms was undertaken, identified errors were amended and specific content was redrafted to accurately reflect legislative requirements. Each use of ‘must’ relates back to a legislative requirement, which is signposted throughout the codes.

**Format and style of the codes**

There were several comments on the format and style of the codes. There were requests for:

- information to flow differently (eg structure of the parts of each code)
- inclusion of content identified in a particular code to flow across all codes
- less variation in the way in which ‘definitions’ are presented
- inclusion of further diagrams/images
- inclusion of further risk assessment tools
- a thorough edit of all content before publication
- incorporation of QR code technology

As a result, the format and style of the codes were considered. The codes have been drafted in alignment with the WorkSafe Victoria Style Guide, which is consistent with the Commonwealth Style Manual (Sixth Edition, 2002) and focuses on ensuring its publications are accessible, readable and in plain English. There have been further improvements to readability within each compliance code.

The codes have also been drafted in accordance with the principles in the Victorian Occupational Health and Safety Compliance Framework Handbook, and to accurately reflect the OHS Act and OHS Regulations.
Summary of public comment and WorkSafe's response

The codes have been drafted to have the same general format, to be as consistent as possible, noting that some codes follow a slightly different structure to best suit differing content in individual codes (eg differences in particular legislation referenced). It is recognised that sometimes terms are defined in different ways (eg appendix including definitions of key terms), however this is not considered appropriate for all codes.

In terms of consistency and flowing content across codes, Part 1 of each code should be consistent and care has been taken to ensure relevant content which has general application (such as the breakout boxes on the duty to consult) flows across all codes.

Where diagrams and illustrations add value they have been used, for example the compliance code: *Excavation* has 28 diagrams and the compliance code: *Hazardous manual handling* has 46 illustrations. Risk assessment tools have been included, where appropriate, noting that often formal risk assessments are not mandated by legislation.

WorkSafe has completed further editing and proofing of codes following public comment to ensure there are no errors. Whilst WorkSafe is not in a position to incorporate QR codes within guidance products at this stage, WorkSafe will continue to consider how it offers tailored guidance as part of its WorkSafe 2030.

There was also a request for details of WorkSafe’s workplace inspections to be published on the website which is outside of the scope of the work on compliance codes.

A comprehensive response to public comment received and any changes made as a result are outlined in ‘Specific comments and responses’.
Summary of public comment and WorkSafe's response

Specific changes to compliance code: Demolition in response to public comment

An amendment has been made to paragraph 124 of the code. Where cranes are used in demolition work to suspend loads that are to be cut and then lowered to the ground, the safe working load of the crane needs to be reduced by 33 per cent when testing (this has been changed from 50 per cent).

It has been clarified that the duty for a person to hold a high risk work (HRW) licence is in addition to an employer's general duty to provide an employee with any necessary training, information, instruction or supervision.

There is new information on what to do if a utility company does not confirm the abolishment of a service (eg electricity), further detail on No Go Zone permits, as well as information included that hot works should only be used if other methods are not reasonably practicable and the content of a safe work method statement (SWMS) when using rope, slings or chain pulling.

There are also a number of minor changes to the draft code. This includes a list of relevant Australian Standards in relation to mechanical demolition, a new appendix which is a checklist for safe use of plant for demolition works, clarification that a demolition plan is not required for minor demolition work and when a construction induction card lapses. Information on powered mobile plant has been aligned with the Plant compliance code (ie that it is suitable for the intended use).

A comprehensive response to public comments received and any changes made as a result are listed in ‘Specific comments and responses’.
Summary of public comment and WorkSafe's response

Specific comments and responses
This section provides a detailed response to feedback received and considered by WorkSafe for the compliance code: Demolition (code) as a result of public comment received.

General comments

Scope

Comment received
An industry representative group commented that the current draft fails to adequately define that only companies under the control of a registered building practitioner can undertake most forms of demolition in Victoria. The document completely omits the role of the relevant building surveyor.

WorkSafe response – noted
The code provides practical guidance on complying with duties under the OHS Act and OHS Regulations and applies to specific duty holders under this legislation (eg employers, employees, self-employed persons, persons with management or control of a workplace, principal contractors, persons who install, erect or commission plant, and designers of buildings or structures). However, it is not possible for this code to deal with all requirements arising during demolition work that a duty holder may encounter at their workplace. It is acknowledged that there may be other obligations which apply to demolition work, such as those applying to building surveyors, but such information is beyond the scope of the code. The break out box under paragraph 4 (now paragraph 3) directs readers to the Victorian Building Authority (VBA), who are the regulator of building practitioners in Victoria, for guidance on building legislation requirements.

Emergency works

Comment received
An industry representative organisation commented that demolition contractors in housing construction may be self-employed persons to whom many of the provisions of this code apply. However, most of the provisions of the code are stated as if they only apply to employers, which can be misleading. Notwithstanding the general statement at paragraph 12 regarding self-employed persons, it will assist compliance if the code included regular reminders that the obligations apply also to self-employed persons as if they were an employer. Alternative mention of self-employed persons could be specifically included wherever an obligation applies also to them.

WorkSafe response – adopted
Amendments have been made to the code to refer to self-employed persons where the OHS Regulations expressly impose obligations on a self-employed person. For example, 'self-employed person' was inserted into paragraph 35 (now paragraph 55) to clarify that the duty to review and revise risk controls implemented apply to employers as well as self-employed persons. For other examples, see paragraph 44 (now paragraph 64) and paragraph 158 (now paragraph 173).
Summary of public comment and WorkSafe's response

The general statement regarding the duties of self-employed persons has also been revised for consistency across codes, and now states that: ‘A self-employed person must ensure, so far as is reasonably practicable, that persons are not exposed to risks to their health or safety arising from the business activities of the self-employed person’ under section 24 of the OHS Act.

Public safety issues, impact to adjacent properties, consultation and heritage

Comment received
An industry representative organisation commented that issues associated with public safety, impacts to adjacent properties, consultation and heritage are not addressed sufficiently due to the existing demolition permit system being ignored. This omission in the opinion of the organisation drastically reduces the relevance of this document.

WorkSafe response – noted
The code provides guidance on complying with duties under the OHS Act and OHS Regulations. It is acknowledged that a wide range of other obligations may apply to demolition work and are beyond the scope of the code. The break out box under paragraph 3 of the new code directs readers to the VBA for guidance on building legislation requirements.

Public access and protection are addressed under ‘Part 4 – Controlling risks in demolition work’ of the code. An employer’s duty to consult with employees under the OHS Act is addressed under ‘Part 1 – Introduction’ and there are also with reminders of this duty placed throughout the code. It is noted that heritage issues are not covered by Occupational Health and Safety (OHS) legislation.

Regulation of demolition

Comment received
An industry representative organisation commented that as the regulation of demolition lies between two separate regulators, the document must be drafted to reflect the obligations of both.

WorkSafe response – noted
The code is made under section 149 of the OHS Act and is intended to provide practical guidance on complying with duties under the OHS Act and OHS Regulations. A wide range of other obligations may apply to demolition work and are beyond the scope of the code. The break out box under paragraph 3 of the new code directs readers to the VBA for guidance on building legislation requirements. Adding further detail on matters not regulated by WorkSafe is outside the scope of the code, particularly as it is a statutory guidance document which has particular legal significance (ie if a person complies with a compliance code, they are deemed to comply with the OHS Act or regulation duty covered by the code).

Demolition supervisor

Comment received
An industry representative organisation commented that there are few mentions of a demolition supervisor, none highlighting the requirement for one. Most Australian states now recognise the role of the demolition supervisor. New South Wales insist that a supervisor is nominated for each project and classify supervisors into restricted and unrestricted categories based on experience.
Summary of public comment and WorkSafe's response

and training. This document does not adequately address the role or requirements for competent supervision of demolition sites.

WorkSafe response – actioned
An amendment has been made to the section on information, instruction, training and supervision in ‘Part 1 – Introduction’, for consistency with other codes. The revised section includes information on the general duty under section 21(1) and (2)(e) of the OHS Act: ‘Employers must provide supervision to employees where such supervision is necessary for safe work.’

WorkSafe recognises the importance of supervision in demolition work but the legislation is performance based and has not elaborated on the role of a ‘demolition supervisor’ as there are many different ways to comply with supervision duties under the OHS Act.

Additionally, the code is drafted consistently with the provisions of the OHS Act and OHS Regulations, including the terms used to describe duty holders. The OHS Regulations do not require a licence to undertake or supervise demolition work unless that work is also high risk work, in which case a high risk work licence is required (covered in Part 3 – Planning demolition work of the code).

Underground fuel tank removal and chemical installations

Comment received
An industry representative organisation commented that underground fuel tank removal and chemical installations are only briefly mentioned. They suggested the code needs a more dedicated section.

WorkSafe response – noted
The code provides guidance on general precautions when dealing with storage tanks or chemical installations in paragraph 207 of ‘Part 6 – Demolition of special structures’. This paragraph states that a demolition plan and an assessment by a suitably qualified person of the proposed demolition method may assist with the demolition of special structures.

Part 1 – Introduction

Paragraphs 3 to 5 – Scope

Comment received
An industry representative group commented that the reference to the regulation and registration (licensing) of demolishers by the VBA in paragraphs 3 to 5 is not specific enough as it does not mention demolishers. The wording should be amended to read:

‘Note: The Victorian Building Authority (VBA) regulates building practitioners (including Builder-Demolisher in various classes) and is responsible for enforcing compliance with the Building Act 1993 and Building Regulations 2016. For more information about your obligations or duties (including permits and registration), go to vba.vic.gov.au.’

WorkSafe response – noted
The code provides guidance on complying with duties under the OHS Act and OHS Regulations. It is acknowledged that a wide range of other obligations may apply to demolition work; however,
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these are beyond the scope of the code. The break out box under paragraph 3 directs readers to the VBA for guidance on the specific building legislation requirements which apply at a point in time. It is not considered appropriate to add further detail on matters not regulated by WorkSafe in the code.

Paragraph 5 – Application

Comment received
An industry representative group commented that paragraph 5 ‘Application’ needs to capture other parties that have duties. For example, designers and persons who install, erect or commission plant.

WorkSafe response – adopted
An amendment was made to paragraph 5 (now paragraph 4) by adding ‘persons who install, erect or commission plant’ and ‘persons who design buildings or structures’ to the list of duty holders covered by the code.

Paragraphs 6 to 16 – Who has duties?

Comment received
An industry representative group commented that the ‘Who has duties?’ section needs to include designers of structures, as design of temporary supports is covered in this code.

WorkSafe response – adopted
A new paragraph 17 has been added under the ‘Who has duties?’ section of ‘Part 1 – Introduction’. Paragraph 17 sets out the legal duties of persons who design buildings or structures. While duties for these persons are more fully covered in the Plant compliance code, the code also provides some guidance relevant to them in relation to temporary structures and the erection of scaffolding.

Paragraph 11 – Who has duties?

Comment received
An industry representative group suggested adding the phrase ‘adequately trained, and/or experienced to do the work’ to bullet point two – Hold an appropriate high risk licence, in paragraph 11.

WorkSafe response – actioned
‘Information, instruction, training and supervision’ in ‘Part 1 – Introduction’ of the code has been revised for consistency with other codes. It includes further information on the employer’s duty to provide employees with the necessary information, instruction, training or supervision to enable them to perform their work in a way that is safe and without risks to health.

Paragraph 12 – Who has duties?

Comment received
An industry representative group suggested that in paragraph 12, the example in brackets should include ‘other workers’ as the duty applies more broadly than just with respect to the public.
Summary of public comment and WorkSafe's response

WorkSafe response – actioned
The example in brackets has been removed from paragraph 12 so as not to limit the application of this duty.

Part 2 – Overview of the risk management process

Paragraph 24 – Identifying hazards

Comment received
An industry representative organisation questioned the categorisation of ‘chemical’, ‘fuel’ and ‘refrigerant’ lines as ‘essential services’ in the first dot point of paragraph 24.

WorkSafe response – actioned
An amendment to paragraph 24 (now paragraph 43) has been made to split essential services (such as gas, water, sewerage, telecommunications and electricity) and chemicals, fuels and refrigerant in pipes or lines into separate bullet points.

Paragraph 25 – Identifying hazards

Comment received
An industry representative organisation commented that the main examples of hazards are missing in paragraph 25. They have suggested the addition of:

- contact with live services within or adjacent to site
- contact with hazardous substances that are part of the structure, eg asbestos
- contact with hazardous substances that are stored on site.

WorkSafe response – actioned
Paragraph 25 (now paragraph 44) has been amended to include additional examples of hazards arising from demolition work. The additional examples include plant or building debris overloading suspended slabs (bullet point two), and contact with live electrical installations or services (bullet point seven).

Paragraph 27 – Assessing the risks

Comment received
An industry representative organisation suggested the addition of the words ‘at a minimum’ to the first line of paragraph 27. They also suggested the addition of ‘prior and during demolition’ to the first bullet point, and the addition of three more bullet points:

- Potential contact with (live) services
- Issues associating with hot works
- Potential impact outside of the site. Unplanned collapses, noises, vibration, dust.

WorkSafe response – noted
Paragraph 27 (now paragraph 46) sets out certain matters a duty holder should consider when assessing risks for demolition work as part of a risk management process, rather than identifying risks. It is not intended to be exhaustive.
Summary of public comment and WorkSafe’s response

Paragraph 36 – Review and revision of risk controls

Comment received
An industry representative organisation suggested HSR be changed to ‘employee/HSR’ in paragraph 36.

WorkSafe response – noted
The duty for an employer to review (and if necessary, revise) risk control measures under regulation 326 includes after they receive a request from an HSR, rather than any employee (see paragraph 55). Paragraph 56 of the new code sets out in what circumstances an HSR may make such a request under the OHS Regulations.

Part 3 – Planning demolition work

Paragraph 37 – Planning demolition work

Comment received
An employee representative organisation commented that paragraph 37 must be amended to include industrial hygienists and remove the word ‘should’. Instead it needs to read: ‘When planning demolition work relevant persons who need to be included are:…’

WorkSafe response – noted
WorkSafe considers that while it is desirable for a duty holder to consult (among others) with an industrial hygienist when planning demolition work, it is not a recommended course of action in every situation.

Comment received
An industry representative organisation suggested the addition of ‘building surveyor’ to the list of relevant persons and the example ‘placing of equipment on suspended floors’ to paragraph 37. They also suggested that ‘some work will require a building permit’ be mentioned in the paragraph.

WorkSafe response – actioned
An amendment has been made to paragraph 37 (now paragraph 57) to add a building surveyor to the list of relevant persons that should be consulted when planning demolition. An amendment has been made to paragraph 44 to include plant or building debris overloading suspended slabs as an example of a hazard arising from demolition work. The break out box under paragraph 3 directs readers to the VBA for guidance on building legislation requirements.

Paragraph 38 – Planning demolition work

Comment received
An industry representative organisation commented that paragraph 38 should make it clear that a formal demolition plan may not be warranted or needed for minor demolition work such as when demolishing a garden shed or a fence at a domestic property. Alternatively, the first sentence should indicate an optional course of action. For example: ‘Employers should consider preparing a demolition plan before the demolition work commences.’
Summary of public comment and WorkSafe’s response

WorkSafe response – actioned
Appendix B provides that given the specialist nature of demolition work, a demolition plan should be prepared to collate key information relevant to the work into a single document. However, a documented demolition plan may not be required for minor works. To give effect to this, a new sentence has been added to paragraph 38 (now paragraph 57). The new sentence reads: ‘A documented demolition plan may not be needed for minor works such as the demolition of a paling fence or a small garden shed’.

Paragraph 45 – Safe work method statements

Comment received
An industry representative organisation suggested that paragraph 45 include the following points:

- To be developed with consultation of the workgroup
- To be signed onto by the workgroup before commencing any work

WorkSafe response – noted
Paragraph 45 (now paragraph 67) lists the requirements of a SWMS prescribed by OHS Regulation 327, which does not specifically address ‘sign off’. Guidance on an employer’s duty to consult with employees under the OHS Act is set out in ‘Part 1 – Introduction’, and there are several reminders on the duty to consult inserted throughout the code.

Paragraph 46 – Safe work method statements

Comment received
An industry representative organisation suggested that paragraph 46 include the following statement: ‘Involving works on Major Hazard Facilities (MHF) including but not limited to oil and petroleum refineries, platforms, gas plants, fertiliser plants, and any place of work deemed under the Commonwealth or State legislation to be classified as a high risk work place.’

WorkSafe response – actioned
Reference to regulation 322 of the OHS Regulations has been inserted at the beginning of the list of paragraph 46 (now paragraph 69) to provide clarity that work on a major hazard facility will only be high risk construction work (HRCW) if it is a type of construction work set out in regulation 322.

Paragraph 48 – Safe work method statements

Comment received
An industry representative organisation disagreed with the following statement from paragraph 48: ‘One SWMS can be prepared to cover all HRCW on a demolition site for simple projects, provided that it takes into account the changing nature of the construction environment.’

They suggested that a separate SWMS should be completed for each phase of work. The intent of a SWMS is to ensure that a particular work task is completed in the safest means necessary. This requires thought and work planning in co-operation with the workforce members performing the works. No determination or calculation has been provided to indicate what classifies as a simple project. Further information needs to be given to support and qualify this statement.
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WorkSafe response – noted
It may be reasonable to use one SWMS on a simple project, provided that it takes into account the changing nature of the construction environment, as set out in paragraph 48 (now paragraph 70). The duty holder will be best placed to determine whether a project can be captured in a single SWMS to meet all of the requirements of the regulations (which are set out in the paragraph).

Paragraph 53 – Information, instruction, training and/or supervision

Comment received
An industry representative organisation questioned paragraph 53 where it stated: ‘It also includes any employee who has not performed any construction work in the past two years, even if they have previously completed construction induction training.’ After clarification by Worksafe Victoria this statement means the worker is deemed to not be competent and therefore must undertake the entire white card course through an approved registered training organisation (RTO) again. They suggested further clarification is needed on the text on this statement to save confusion.

WorkSafe response – actioned
To clarify when a person's construction induction card lapses, paragraph 53 (now paragraph 36) was amended to: ‘A person’s construction induction card lapses if that person has not performed any construction work for any consecutive period of two years.’

Paragraph 63 – High risk work licences

Comment received
An industry representative organisation suggested the addition of ‘and is competently trained to do the work’ to paragraph 63 which relates to holding an appropriate high risk licence in relation to the work. They also suggested including a reference to Certificate III in Demolition.

WorkSafe response – actioned
Paragraph 60 (now paragraph 73) has been amended to clarify that the obligation to hold a high risk work licence is in addition to an employer’s duty to provide employees with any necessary information, instruction, training and supervision to enable them to do their work safely. A cross reference to ‘Part 1 – Introduction’ has also been added. The section on information, instruction, training and supervision in Part 1 of the code has been revised for consistency with other compliance codes.

Paragraph 65 – Asbestos registers and licensing

Comment received
An industry representative organisation commented that paragraph 65 should specifically include the requirement to ensure asbestos has been identified and removed, so far as reasonably practicable, before the demolition work is commenced. This could be reiterated at paragraph 85.

WorkSafe response – adopted
The duties to identify and remove asbestos are specific duties which apply when undertaking demolition work where asbestos is present in the workplace. Therefore, a new sentence in brackets has been added to the first bullet point of paragraph 65 (now paragraph 78). The revised bullet point reads: ‘duties specific to undertaking demolition work where asbestos is
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present in the workplace (including duties to identify asbestos and ensure, so far as is reasonably practicable, that it is removed before the demolition work is commenced)'

Paragraph 66 – Asbestos registers and licensing

Comment received
An industry representative organisation commented that paragraph 66 seems inconsistent with advice. It gives the impression that asbestos is barely an issue. They suggested that the wording needs to be stronger, the steps to take more dramatic, ie removal of as much asbestos as possible prior to demolition, and specific sections of the reference material needs to be noted, not the whole 96 page document.

WorkSafe response – noted
The intent of paragraph 66 (now paragraph 79) is to set out high level matters related to asbestos that a duty holder should consider when planning demolition. Further detail may create an expectation that compliance with the Demolition compliance code on matters related to asbestos is sufficient to comply with duties in Part 4.4 of the OHS Regulations. This is not the case and there has been a cross reference in paragraph 80 to the regulations and the Removing asbestos in workplaces compliance code which provide more comprehensive information on the topic.

Paragraph 65, 66 and 67 – Asbestos registers and licensing

Comment received
An industry representative organisation commented that paragraphs 65, 66 and 67 require further detail regarding the requirements relating to asbestos. Simply referring to the asbestos codes is not sufficient information considering the level of risk regarding asbestos hazards and the high standards of regulation in this area.

WorkSafe response – actioned
Further details regarding the duty to identify and remove asbestos have been added to the first bullet point of paragraph 65 (now paragraph 78) and is presented in brackets. The revised bullet point reads: ‘duties specific to undertaking demolition work where asbestos is present in the workplace (including duties to identify asbestos and ensure, so far as is reasonably practicable, that it is removed before the demolition work is commenced)’ It is not considered appropriate to give any further detail on the topic, as the Removing asbestos in workplaces compliance code provides detailed comprehensive information on asbestos hazards in this regard.

Paragraph 69 – Essential services

Comment received
An industry representative organisation commented that ‘chemical’, ‘fuel’ and ‘refrigerant’ lines are not essential in paragraph 69. If they are still included, the following should be taken into consideration: ‘Further detail regarding the list of essential services is required, especially regarding the mention of “chemicals and fuel”.’ In this case, they recommend specific mention of HAZMAT or HAZCHEM specific text and or including parts of the GHS due to the high risk nature of working with hazardous chemicals and substances that can pose a significant risk to health and safety if not managed appropriately.
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WorkSafe response – actioned
Paragraph 69 (now paragraph 81), has been split into essential services and chemicals, and examples of essential services have been placed in brackets (such as gas, water, sewerage, telecommunications and electricity). A reference directing readers to the Hazardous substances compliance code for further information on working with hazardous substances has also been added in paragraph 84.

Paragraph 70 – Essential services

Comment received
An industry representative organisation suggested the addition of ‘Measures include signage, included in SWMS’ to the end of paragraph 70.

WorkSafe response – actioned
A new sentence has been added to the end of paragraph 70 (now paragraph 83). The new sentence reads: ‘Any employer undertaking works in the vicinity of the service should ensure that their systems of work and any SWMS outline how the health and safety risks associated with the works will be controlled.’

Paragraph 71 – Adjacent or adjoining buildings

Comment received
An industry representative organisation suggested the replacement of the word ‘should’ with ‘can’ in the second sentence of paragraph 71, making the sentence: ‘The demolition process can not adversely affect the structural integrity of any other building’. They also suggested the addition of: ‘This should be discussed with the relevant building surveyor (RBS).’

WorkSafe response – actioned
Paragraph 71 (now paragraph 85), has been amended to provide that the demolition process ‘needs to’ be done in a way that does not adversely affect the structural integrity of other buildings. This amendment is consistent with the language framework for compliance codes. The break out box under paragraph 3 in ‘Part 1 – Introduction’ directs readers to the VBA for information on building legislation requirements.

Part 4 – Controlling risks in demolition work

Paragraph 76 – The building or structure to be demolished

Comment received
An industry representative organisation suggested that the following needs to be incorporated into paragraph 76: ‘Check for any basements underground tanks requiring backfill or support’.

WorkSafe response – noted
Paragraph 76 (now paragraph 90), relates to the use of temporary supports to maintain the integrity of the building or structure being demolished. It does not list what elements of a building or structure in particular may need support. Guidance on basements is set out in ‘Part 6 – Demolition of special structures’, and is listed in Appendix B as matters a demolition plan may include.
Summary of public comment and WorkSafe's response

**Paragraph 89 – Polychlorinated biphenyls**

**Comment received**
An industry representative organisation suggested the addition of the following underlined text to the first sentence of paragraph 89: ‘...may be encountered in ballast capacitors of fluorescent light fittings, in other electrical capacitors and…’ The suggested addition is intended to provide more clarity about the most common source of PCBs, i.e., the ballast capacitors of fluorescent lights.

**WorkSafe response – actioned**
Capacitors of old fluorescent light fittings are an example of a common source of Polychlorinated Biphenyls (PCBs) in light fittings. Therefore, this example has been added to paragraph 89 (now paragraph 103).

**Paragraph 98 – Public access and protection**

**Comment received**
An industry representative organisation suggested the addition of ‘RBS’ and ‘where a building permit applies’ in paragraph 98.

**WorkSafe response – noted**
The code provides guidance on complying with duties under the OHS Act and OHS Regulations. It is acknowledged that a wide range of other obligations may apply to demolition work; however, these are beyond the scope of the code. The break out box under paragraph 4 (now paragraph 3), directs readers to the VBA for guidance on building legislation requirements. It is not considered appropriate to add further detail on matters not regulated by WorkSafe to the code.

**Paragraph 100 – Public access and protection**

**Comment received**
An industry representative organisation suggested that ‘hoarding’ in paragraph 100 needs to have a stronger definition. The point about consulting with the VBA needs to be the focus rather than an easy to miss side note. One way to achieve this is to replace ‘should’ with ‘must’.

**WorkSafe response – actioned**
Paragraph 100 (now paragraph 114) was amended to move commentary on consultation to a separate paragraph (now paragraph 115). ‘Must’ has not been used as there is no legal duty in the OHS Act or OHS Regulations to consult with the VBA.

**Paragraph 103 – Plant and equipment**

**Comment received**
An industry representative organisation suggested inserting ‘plant operators and persons who install, erect or commission plant’ after ‘employers’ in paragraph 103, as these are the most relevant duty-holders.

**WorkSafe response – noted**
Paragraph 103 (now 118) describes duties under Part 3.5 of the OHS Regulations. The duties relating to ‘a person who installs, erects or commissions plant’ are under the OHS Act rather than
Summary of public comment and WorkSafe's response

the OHS Regulations and it is therefore not appropriate to include them as a duty holder in this paragraph.

Comment received
An industry representative organisation suggested that oxy – acetylene be replaced with oxy/fuel gas (includes LPG and acetylene) as oxy-acetylene is outdated. They also suggested the addition of 'demolition saws'.

WorkSafe response – actioned
Paragraph 103 (now paragraph 118) has been amended to replace the outdated term 'oxy-acetylene' with 'oxy-fuel'. Demolition saws are already included in the final bullet point of the list of types of plant typically used for demolition work.

Paragraph 104 – Plant and equipment

Comment received
An industry representative organisation commented that according to WorkSafe one of the issues that inspectors routinely find is unsafe demolition involving the use of powered mobile plant that is unsuitable for demolition work. It is suggested that an additional paragraph be included to highlight this potential, for example: 'It is important to establish that any powered mobile plant to be used for demolition is suitable for the intended demolition work.'

The organisation also suggested that the fourth bullet point in paragraph 104 should be changed for consistency with paragraph 355 of the proposed Plant compliance code: ‘Plant should be inspected, maintained and cleaned according to the recommendations and information provided by the designer and manufacturer. In the absence of information from the designer or manufacturer, plant should be maintained and cleaned in accordance with specifications developed by a suitably qualified person.’

WorkSafe response – actioned
The fifth bullet point of paragraph 104 (now paragraph 119), has been amended to align with the guidance in the Plant compliance code.

A new bullet point, the fourth bullet point, has also been inserted into paragraph 119, providing that an employer needs to ensure that ‘any powered mobile plant is suitable for the intended use, including the intended working environment’.

Comment received
An industry representative organisation suggested the addition of ‘current risk assessment is completed’ to paragraph 104. They also suggested that ‘acetylene’ be replaced with ‘fuel gas’.

WorkSafe response – actioned
Paragraph 104 (now paragraph 119) has been amended to replace the outdated term 'oxy-acetylene' with 'oxy-fuel'. Paragraph 119 lists typical matters an employer needs to ensure are in place before using plant, which is not intended to be an exhaustive list. The Plant compliance code, which readers are directed to in paragraph 121 and elsewhere throughout the code, provides guidance on risk assessments for plant.
Summary of public comment and WorkSafe's response

Paragraph 109 – Cranes

Comment received
An industry representative organisation commented that in paragraph 109 there should be a method to lower the reduction of the safe work load of the crane (ie reduce it by less than 50 per cent) where loads can be established and weights are confirmed.

WorkSafe response – actioned
Paragraph 109 (now paragraph 124) has been amended to provide that the safe working load of a crane should be reduced by 33 per cent, rather than 50 per cent, to allow for miscalculations in the test weighing of loads. The 33 per cent reduction is in keeping with good practice and clause 6.22.3 of AS 2550.1-2011: Cranes, hoists and winches - Safe use - General requirements, which provides that cranes used for lifting demolition products shall have a lifting capacity of not less than 1.5 times the assessed load.

Editorial amendments have also been made to paragraph 124 to clarify the relationship between testing for an accurate load and the reduction of the safe working load of the crane to allow for miscalculations.

Paragraph 121 – Electrical risks

Comment received
An industry representative organisation commented that distribution companies will not issue written confirmation of abolishment or sign any internal forms to record their visit. This has been the case for some time, which makes it difficult to comply. The organisation suggested that paragraph 121 be amended to clarify the expectations around a power service company providing written confirmation of completion of works. The organisation queried whether a demolition company specific form to indicate subject works have been completed would be considered appropriate.

WorkSafe response – actioned
Paragraph 121 (now paragraph 136) has been amended to provide guidance on ensuring electrical services have been abolished where the electricity distribution company does not provide written confirmation. In that situation, the amendment provides that the ‘employer needs to obtain written confirmation from a suitably qualified person’.

Paragraph 122 – Electrical risks

Comment received
An industry representative organisation suggested that ‘strict controls around the cutting of cables’ replace the word ‘dead’.

WorkSafe response – noted
The wording in paragraph 122 (now paragraph 137) quoting a requirement for ‘additional controls' to control the risk of electric shock is considered easier to understand than a requirement for 'strict' controls. The duty to reduce a risk so far as reasonably practicable, if it cannot be eliminated, ensures the controls must be effective. The use of the word 'dead' to signify an electrical cable is not live is also intended to be as clear as possible.
Paragraph 124 - Electrical risks

Comment received
An industry representative organisation suggested the addition of ‘Permits may be required to work within the nominated No Go Zone’ to paragraph 124.

WorkSafe response – noted
Paragraph 124 (now paragraph 139) has been amended to add further detail to the guidance regarding the No Go Zone rules, which need to be followed when operating powered mobile plant near overhead powerlines or underground assets. The amendment provides that, among other things, the rules require an employer to obtain a permit from the electrical asset owner prior to starting work in certain circumstances. Paragraph 140 of the new code directs readers to the WorkSafe website for further information on the No Go Zone rules.

Paragraph 126 – Fire prevention

Comment received
An industry representative organisation commented that the ‘Fire prevention’ heading just prior to paragraph 126, should be changed to ‘Fire Protection and Prevention’ to better reflect the recommendations of this section.

WorkSafe response – adopted
The subheading ‘fire prevention’, prior to paragraph 126 (now paragraph 141), has been amended to ‘fire prevention and protection’, to better reflect the content of this section.

Comment received
An industry representative organisation commented that some demolitions may not pose a fire risk, and where a fire risk exists the code needs to allow for the most appropriate firefighting equipment, ie not necessarily a fire hydrant or fire hose reel, as implied. The first sentence of paragraph 126 should be changed to: ‘Where the risk of fire has not been eliminated adequate firefighting equipment should be provided and maintained during the demolition of a building or structure. Appropriate equipment may include, but is not limited to, a fire hydrant or fire hose reel, an existing sprinkler system, or fire extinguishers.’

WorkSafe response – actioned
Paragraph 126 (now paragraph 141) has been amended to include that ‘where there is a risk of fire (for example, demolition that involves hot works) that cannot be eliminated’, adequate fire prevention equipment needs to provided and maintained during the demolition of a building or structure, and that access to the fire protection service also needs to be maintained.

Paragraph 127 – Fire prevention

Comment received
An industry representative organisation suggested the addition of the following clauses to the fire prevention section:

- Consideration should be given to alternative methods that remove the need for hot works.
- Since there is a risk of fire following hot works, hot works should cease prior to site closure to allow the area to be observed. This will reduce the risk of a fire starting.
Summary of public comment and WorkSafe's response

WorkSafe response – actioned
Paragraph 127 (now paragraph 142), referred to in the submission, is related to fire prevention equipment. The comment appears to relate to paragraph 128. Paragraph 128 (now paragraph 143) has been amended to replace ‘welding and cutting operations’ with ‘welding and cutting and other hot works’.

Comment received
An industry representative organisation suggested the replacement of ‘welding and cutting’ with ‘hot works’ in paragraph 127.

WorkSafe response – actioned
Paragraph 127 (now paragraph 142), referred to in the submission, is related to fire prevention equipment. The comment appears to relate to paragraph 128. Paragraph 128 (now paragraph 143) has been amended to replace ‘welding and cutting operations’ with ‘welding and cutting and other hot works’, to use the modern term while retaining common examples of hot works. A consequential amendment was also made to the subheading immediately above paragraph 143 to replace ‘welding and cutting’ with ‘hot works’.

Part 5 – Demolition methods

Paragraph 137 – Manual demolition

Comment received
An industry representative organisation suggested that in paragraph 137, ‘hazardous chemicals’ be changed to ‘hazardous chemicals/materials’ and ‘contact with services’ be added to the list of examples.

WorkSafe response – actioned
‘Hazardous chemicals’ in paragraph 137 (now paragraph 153) has been amended to ‘hazardous chemicals and materials’. ‘Live electrical services’ has also been added to paragraph 137 (now paragraph 153).

Paragraph 144 – Fragile roofs

Comment received
An industry representative organisation suggested that the words ‘if asbestos cement roofing’ in paragraph 144, should be changed to: ‘if the roofing material contains asbestos’, as types of asbestos containing material (ACM) other than asbestos cement may be present, such as bitumen roofing membranes.

WorkSafe response – noted
The content in paragraph 144 (now paragraph 159) relates to fragile roofs, as indicated by the subheading ‘Fragile roofs’, and asbestos cement roofing is one type of fragile roof. Other types of non-fragile roofing that may contain asbestos are not covered by this section.
Summary of public comment and WorkSafe's response

**Paragraph 157 – Mechanical demolition**

Comment received
An industry representative organisation suggested that ‘loaders’ and ‘bulldozers’ are removed from the list in paragraph 157 as they are not standard examples.

WorkSafe response – adopted
Paragraph 157 (now paragraph 172) has been amended to remove bulldozers and loaders from the examples of powered mobile plant used in mechanical demolition.

**Paragraph 158 – Mechanical demolition**

Comment received
An industry representative organisation suggested the addition of ‘Rollover Protection (ROPS)’, ‘Falling Objects Protection’ and ‘Front Cabin Guarding’ to the first three bullet points of paragraph 158 respectively.

WorkSafe response – noted
Paragraph 158 (now paragraph 173) provides a non-exhaustive list of risks associated with the operation of powered mobile plant. The detailed information on controlling these risks is covered by the *Plant* compliance code, which is referenced in the break out box immediately below the paragraph.

**Paragraph 160 – Working on suspended floors**

Comment received
An industry representative organisation suggested the addition of ‘as specified/approved by the suitably qualified person’ to the first dot point of paragraph 160.

WorkSafe response – actioned
Paragraph 160 (now paragraph 175) has been amended to clarify that where plant has been specified in the SWMS, another piece of plant of the same type and usage may only be substituted if:

- the substituted plant is not heavier than the specified plant, and
- advice is obtained from a suitably qualified person that the operating characteristics and dimensions of the substitute plant will not introduce any additional risks.

This is more detailed guidance than the public comment draft, which provided that the substituted plant should not be heavier or larger than the SWMS listed plant.

**Paragraph 162 – Working on suspended floors**

Comment received
An industry representative organisation suggested that ‘ie excavators’ is placed after ‘Load shifting equipment’ in paragraph 162 to make it clear what is meant.

WorkSafe response – adopted
Paragraph 162 (now paragraph 177) has been amended by inserting excavators as an example of load shifting equipment.
Summary of public comment and WorkSafe's response

Paragraphs 164 and 165 – Demolition of walls

Comment received
An industry representative organisation suggested the addition of a point to paragraphs 164 and 165 about what else is needed, ie shade cloth, external scaffold, steel barricade.

WorkSafe response – noted
Paragraphs 164 and 165 (now paragraphs 180 and 181), specifically relate to the demolition of walls. The risk controls suggested in the submission are used to control risks to both persons working on the demolition site and the public, and are not limited to the demolition of walls. Guidance on public access and protection is set out in paragraphs 112 to 117.

Paragraph 167 – Using plant and attachments

Comment received
An industry representative organisation commented that they noted the use of ‘high reach machinery’ in paragraph 167.

WorkSafe response – actioned
After seeking further clarification from the organisation, a new paragraph has been inserted after paragraph 167 (now paragraph 183). Paragraph 183 provides that the use of specialised high reach excavators can eliminate many of the hazards associated with other demolition methods and that an employer needs to obtain advice from a suitably qualified person to determine whether high reach machinery can be used for a project.

A new ‘Appendix G – Checklist for safe use of plant for demolition works’ has also been created, setting out factors that should be considered when assessing the risks associated with the use of plant in demolition works.

Paragraph 169 – Using plant and attachments

Comment received
An industry representative organisation suggested the inclusion of ‘Plant risk assessments including attachments’ to paragraph 169.

WorkSafe response – actioned
Paragraph 169 (now paragraph 186), directs readers to the Plant compliance code for guidance on duties related to plant in the workplace. Paragraph 169 (now paragraph 186), has been amended to explicitly provide that ‘plant’ includes attachments, as paragraph 186 relates to plant attachments.

Paragraph 172 – Load reduction

Comment received
An industry representative organisation suggested the addition of the word ‘original’ before the words ‘design loads’ to paragraph 172 to make the meaning of the sentence clearer. The sentence is suggested to read: ‘Structures which are not carrying their original design loads...’,
Summary of public comment and WorkSafe's response

WorkSafe response – noted
In practice, very few structures carry design loads on members, and the design loads could be changed over time so it is not considered necessary to change the wording of this paragraph.

Paragraph 176 – Wire rope, slings and chain pulling

Comment received
An industry representative organisation suggested the addition of a new clause: ‘Cable strength, available pulling capacity and connection details should be determined and documented prior to the proposed activity’ to the ‘Wire rope, slings and chain pulling’ section.

WorkSafe response – actioned
Paragraph 176 (now paragraph 193), has been amended to provide that cable strength, available pulling capacity and connection details should be determined and documented in the SWMS prior to undertaking the work.

To improve the clarity of the section, the remainder of paragraph 176 (now paragraph 193), which relates to controls for failure of wire rope, slings or chains, has been moved to a separate new paragraph 194.

Paragraph 178 – Wire rope, slings and chain pulling

Comment received
An industry representative organisation asked if the relevant Australian Standards can be nominated in paragraph 178, as it is unclear.

WorkSafe response – actioned
Paragraph 178 (now paragraph 196) has been amended to refer to Appendix F, which sets out relevant Australian Standards. Appendix F has also been amended to list the following standards as relevant to wire ropes and slings in mechanical demolition:

- AS 1353 Flat synthetic-webbing slings
- AS 1666 Wire-rope slings
- AS 3775 Chain slings for lifting purposes
- AS 1438 Wire-coil flat slings

Paragraph 187 – Procedure when explosives fail

Comment received
An industry representative organisation questioned the use of the word ‘engineer’ in paragraph 187 when previously it has been ‘person of competence’.

WorkSafe response – noted
Paragraph 187 (now paragraph 205), relates to procedures to induce safe collapse should explosives fail to detonate. The use of ‘engineer’ rather than ‘competent person’ is intended to provide a useful, specific example. It is only one example of such a procedure and it is open for duty holders to explore other methods of compliance.
Summary of public comment and WorkSafe’s response

Part 6 – Demolition of special structures

Paragraph 189 – Using explosives

Comment received
An industry representative organisation suggested the addition of ‘The above structures require supervision from a Registered Builder Practitioner – Builder-Demolisher in the appropriate class’ to paragraph 189.

WorkSafe response – noted
The breakout box immediately after paragraph 3 directs readers to the VBA website for information on building obligations, including permits and licences. The requirement for registration under building legislation may not be limited to the demolition of special structures and duty holders should refer to the VBA for clarification of these requirements.

Paragraph 195 – Pre and post-tensioned concrete

Comment received
An industry representative organisation commented that there is no mention of part of beam or floor demolition which occurs often in paragraph 195 eg Tendons must be securely re-bonded to maintain remaining structure.

WorkSafe response – actioned
A new paragraph has been inserted after paragraph 195 (now paragraph 213). Paragraph 213 provides that if partial demolition is required (ie cutting penetrations into tensioned floor slabs), precautions need to be taken to ensure the tendons are adequately restrained prior to work commencing. An employer needs to obtain advice from a suitably qualified person (for example, an experienced structural engineer) regarding the proposed work plan for partial demolition.

Paragraph 198 – Fire-damaged, ruinous and structurally unsound buildings or structures

Comment received
An industry representative organisation suggested that paragraph 198 should note that hazardous material assessment itself can be difficult to complete at times. In those situations, it should be assumed there are hazardous materials and the procedures/control measures should reflect this.

WorkSafe response – actioned
A new paragraph has been inserted before paragraph 198 (now paragraph 218). The new paragraph 218 provides that a report on hazards associated with unsound buildings or structures should clearly identify any areas of the building or structure where it is likely that hazardous materials may exist but it has not been possible to check for their presence. An amendment was also made to paragraph 218 to state that the report should specify risk controls for both hazards and likely hazards.
Summary of public comment and WorkSafe's response

Paragraph 218 – Facade retention

Comment received
An industry representative organisation suggested that in building facade retentions in paragraph 218, consider support for cellar/basements (refer to paragraph 205).

WorkSafe response – noted
Guidance in ‘Part 6 – Demolition of special structures’ addresses supports for cellars and basements.

Paragraph 222 – General precautions

Comment received
An industry representative organisation suggested the replacement of ‘Acetylene’ with ‘LP’ in paragraph 222, bullet point three. No one uses the above in demolition. Also, after some bad incidents over past years, they suggested the addition of ‘ensure LPG bottles are not used in basements but are placed above in well vented area’.

WorkSafe response – actioned
Paragraph 222 (now paragraph 243), was amended to replace ‘oxy-acetylene cutting’ with ‘oxy-fuel gas cutting’, consistent with other updates to this term throughout the code.

An amendment was also made to insert a new paragraph 224, which provides that: ‘LPG gas cylinders should not be used in any area, including basements and cellars, where it is likely that there will be insufficient ventilation to ensure any gas leakage is readily dispersed, unless specific risk control measures to ensure adequate ventilation are designed, implemented and continuously monitored’.

Appendices

Appendix B – Demolition plan

Comment received
An industry representative organisation suggested the addition of the sentence: ‘Is a requirement for a demolition permit’ in the introduction paragraph of page 51 - Appendix B – to make it the second sentence. They also suggested in ‘A demolition plan may include’ the replacement of the word ‘may’ with ‘should’, and to add ‘and on roadway footpath closures’ to dot point 8.

WorkSafe response – actioned
Amendments to Appendix B were made to provide that a demolition plan ‘should’ (rather than ‘may’) include the listed matters, and to include a reference to any roadway footpath closures as a matter that should be included in a demolition plan.

As set out in the opening to Appendix B, a demolition plan collates key information relevant to the work. It is not intended to be an exhaustive document of all legal requirements. The listed matters do not include, for example, high risk work licence requirements under the OHS Act or OHS Regulations.
Summary of public comment and WorkSafe's response

Appendices

Appendix A – Construction Stakeholder Reference Group

Organisations represented
- Civil Contractors Federation
- Construction, Forestry, Mining and Energy Union (Construction and General Division Victorian-Tasmanian Branch)
- Housing Industry Association
- Master Builders Association of Victoria
- Plumbing Trades Employees Union
- The Australian Industry Group
- Victorian Congress of Employer Associations
- Victorian Trades Hall Council
Summary of public comment and WorkSafe's response

Appendix B – List of submissions received

Submissions received for all compliance codes
- Air-Met Scientific Pty Ltd
- Australian Industry Group
- Australian Manufacturing Workers Union
- Australian Nursing and Midwifery Federation Victorian Branch
- Community Public Sector Union SPSF Group Victorian Branch
- Construction, Forestry, Mining and Energy Union (Construction and General Division Victorian Branch)
- Demolition Contractors' Association of Victoria
- Des Caple and Associates Pty Ltd
- Dyne Industries
- Haztech Environmental
- Housing Industry Association
- Oscar Szanto
- Paul Rawlings
- P-E Handley-Walker Pty Ltd (t/a HAZCOM GHS)
- RG Chemical Safety
- South East Water
- Tanya Ferrara
- Tony Farfor and Associates
- TruSafety Solutions
- Victorian Automobile Chamber of Commerce
- Victorian Trades Hall Council
- Vital Safety Pty Ltd

In addition, seven submissions were received that were marked confidential or did not provide WorkSafe permission to publish the name or organisation the submission was from.

Submissions received for compliance code: Demolition
- Demolition Contractors’ Association of Victoria
- Housing Industry Association
- Victorian Trades Hall Council
Summary of public comment and WorkSafe’s response

Appendix C – Public comment statistics

WorkSafe received 29 submissions on all eight codes that were released for public comment from 1 May to 9 June 2017.

- Seven were from individuals
- 22 were from organisations (including five from employee organisations, and four from employer and industry organisations)
- Three specifically referred to the compliance code: Demolition.

During public comment the consultation website received 4,420 visits with 680 documents downloads.