

Fall Protection FEEDBACK from Review Process

QUESTION 1

First, I am curious what implications a standard of 1.8M will have within the community, specifically related to hardware (lanyards). Does this standard require the use of retractable lanyards; or shorter shock absorbing lanyards? Furthermore, has there been any consideration related to the bulky nature of retractable lanyards and the additional weight (if any)? There is a concern with a retractable and the potential back injuries related to the location on the body when not in use (i.e. walking).

ANSWER: The standard does not require the use of retractable lanyards. There is, in fact no requirement for a specific type of lanyard. The standard only requires that an effective fall protection system be used that meets the requirements of a particular situation.

The issue of extra weight has been discussed and some members of the team felt that the extra protection would outweigh the extra weight in the right circumstances. Remember that this is an option to be discussed among other options in the development of a fall protection system that is appropriate for the situation.

QUESTION 2

Second, if a new training program is created and has an expiration date, how will the IEC deal with those people from out of town who carry CSAO training? Will this be recognized or will all persons working the Chemical Valley be required to up date their training?

I agree with the expiration date of the training just concerned companies may not be able to get their workforce prepared quickly if they are required to complete additional training (i.e. IEC BSO, H2S, IOL & Fall Protection) especially since this training has been proposed as a 4 hour initial training and 2 hour retraining.

ANSWER: First, this is not an IEC initiative. This is ultimately developed as a team effort involving the Client, the Contractor, the Unions and the IEC. The SME team has discussed the issue of external training of many types and the recommendation has been made to the steering committee that training will be accepted in an interim period as long as the training meets certain basic criteria. This will only be true for a “phase in” period, after which anyone requiring fall protection training will be expected to have been through the standardized training program. The time requirement for the program has not been decided at this point. The 4 and 2 hour items were suggestions only. The development of the program will better define the required amount of time to effectively deliver the standardized course.

The SME team has been sensitive to the requirements for retraining and we have recommended to the Steering Committee that the requirement for standardized training be set at January 1, 2011. This should give sufficient time for Employers and Unions to adjust to the new requirements.

One final item to remember: The notes above are currently recommendations to the steering committee. They will decide on the final requirements based on the SME team recommendations and their discussions at that level.