

Compliance Codes – Public Comment Submission Form			
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Proposed Demolition Compliance Code

Please provide your comments on the proposed Demolition Compliance Code. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

General comments	
<p>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.</p> <p>The document completely omits the role of the relevant building surveyor (RBS).</p> <p>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 DCAV drastically reduces the relevance of this document.</p> <p>As the regulation of Demolition lays between two separate regulators the document must be drafted to reflect the obligations of both.</p> <p>Demolition Supervisor - there are few mentions of a demolition supervisor, none highlighting the requirement for one. Most states now recognise the role of the demolition supervisor. NSW insist that a supervisor is nominated for each project. They go further in classifying the supervisors into restricted and unrestricted category's based on experience and training. This document does not adequately address the role or requirements for competent supervision of demolition sites.</p> <p>Underground fuel tank removal and chemical installations are only briefly mentioned. Needs a more dedicated section</p>	
Specific comments	
<p><i>PART 1 - Introduction</i></p>	<p>Scope clauses 3 - 5 The reference to the regulation & registration (licensing) of demolishers by the Victorian Building Authority is not specific enough as it does not mention demolishers</p>

	<p>The wording should be amended to read</p> <p>'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</p> <p>Clause 11 dot point 2 Hold an appropriate high risk licence Add 'adequately trained, and or experienced to do the work'</p>
<p><i>PART 2 – Overview of the Risk Management Process</i></p>	<p>Clause 24 Questioning the categorisation of 'chemical', 'fuel' and 'refrigerant' lines as 'essential services' in the first dot point. Main examples of hazards are missing in point 25. Advise the addition of:</p> <ul style="list-style-type: none"> - contact with live services within or adjacent to site - contact with hazardous substances that are part of the structure, e.g. asbestos - contact with hazardous substances that are stored on site <p>Clause 27 Add 'at a minimum' to the first line First dot point - add 'prior and during demolition' Additional dot points to be added</p> <ul style="list-style-type: none"> - Potential contact with (live) services - Issues associating with hot works - Potential impact outside of the site. Unplanned collapses, noises, vibration, dust. <p>Clause 36 – change HSR to 'employee/HSR'</p>
<p><i>PART 3 – Planning the Demolition Work</i></p>	<p>Clause 37 Add 'building surveyor' to the list of relevant persons. Mention that some work will require a building permit</p>

	<p>Clause 37 Add the example 'placing of equipment on suspended floors'</p> <p>SWMS clause 46 Include the following statement. Involving works on Major Hazard Facilities (MHF) including but not limited to oil & 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.</p> <p>Clause 45 Include: - To be developed with consultation of the workgroup - To be signed onto by the workgroup before commencing any work</p> <p>Clause 46, 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." We disagree with this statement. 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.</p> <p>Clause 53 "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 Vic this statements means the worker is deemed to not be competent and therefore must undertake the entire white card course through an approved RTO again. Further clarification needs to be given in the text on this statement to save confusion.'</p>
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	<p>Clause 63 Hold an appropriate high risk licence in relation to that work Add 'and is competently trained to do the work. Refer Certificate III in Demolition.</p> <p>Clauses 65, 66 & 67 This requires further detail regarding the requirements, simply referring to the Codes as a whole is not sufficient information considering the level of risk regarding asbestos hazards and the standards surrounding its management.</p> <p>Clause 66 This clause seems inconsistent with advice. It gives the impression that asbestos is barely an issue. The wording needs to be stronger, the steps to take more dramatic, i.e. removal of as much asbestos as possible prior to demolition. Specific sections of the reference material need to be noted, not the whole 96 page document.</p> <p>Clause 69 Same as the clause 24 correction, 'chemical', 'fuel' and 'refrigerant' lines are not essential. Should they still be 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 specific mention of HAZMAT or HAZCHEM specific text and or including parts of the GHS is recommended 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. This paragraph is far too light in specific detail.</p> <p>Clause 70 Add to the end 'Measures include signage, included in SWMS'</p> <p>Clause 71 Second sentence, replace the word 'should' with 'can', making the sentence 'The demolition process can not adversely affect the structural integrity of any other building' Add 'This should be discussed with the relevant building surveyor (RBS).'</p>
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<p><i>PART 4 – Controlling Risks in Demolition Work</i></p>	<p>Clause 76 Need to incorporate into Item: 'Check for any basements underground tanks requiring backfill or support'</p> <p>Clause 98 Add 'RBS' and 'where a building permit applies'</p> <p>Clause 100 Hoarding needs to have a stronger definition The point about consulting with the Victorian Building Authority needs to be the focus rather than an easy to miss side note. Eg., replace 'should' with 'must'</p> <p>Clause 103 Oxy – acetylene is outdated. Replace with oxy/fuel gas (includes LPG & acetylene) Add 'demolition saws'</p> <p>Clause 104 Add 'current risk assessment is completed' Repeat of above regarding oxy-acetylene in 103. Replace 'acetylene' with 'fuel gas'</p> <p>Clause 109 There should be a method to lower the reduction of the safe work load of the crane (i.e. reduce it by less than 50%) where loads can be established and weights are confirmed.</p> <p>Clause 121 The Distribution Companies will not issue written confirmation of abolishment, they will not even sign any internal forms to record their visit, this has been the case for some time, so we could never comply. Amend so it is possible to comply with this clause.</p> <p>Otherwise This clause requires revision and further clarification regarding the expectation that a power service company will provide written confirmation that this has occurred. We are not aware of any</p>
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	<p>company (Origin, Energy Australia) who provide a written docket confirming completion of works. Is a demolition company specific form to indicate subject works have been completed appropriate?</p> <p>Clause 122 Fix wording. Suggesting 'strict controls around the cutting of cables'. Replace the word 'dead'</p> <p>Clause 124 Add 'Permits may be required to work within the nominated No Go Zone'.</p> <p>Clause 127 Replace 'welding and cutting' with 'hot works'</p> <p>Fire prevention section notes Add these addition clauses to fire prevention - Consideration should be given to alternative methods that removes 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.</p>
<p><i>PART 5 – Demolition Methods</i></p>	<p>Clause 137 Change hazardous chemicals to hazardous chemicals/materials Add 'contact with services' to the list of examples</p> <p>Clause 157 Remove 'loaders' and 'bulldozers' from the list as they are not standard examples.</p> <p>Clause 158 Add 'ROPS', 'FOPS' and 'Front Cabin Guarding' to the first three dot points respectively.</p> <p>Clause 160 Add to the first dot point 'as specified/approved by the suitably qualified person'</p>

	<p>Clause 162 Put 'i.e. excavators' after 'Load shifting equipment' to make it clear what is meant.</p> <p>Demolition of Walls Clauses 164 - 165 Need to add a point about what else is needed, i.e. shade cloth, external scaffold, steel barricade.</p> <p>Clause 167 Note the use of 'high reach machinery'</p> <p>Clause 169 Include 'Plant risk assessments including attachments'</p> <p>Clause 172 Add 'original' making the sentence 'Structures which are not carrying their <i>original</i> design loads...' to make the meaning of the clause clearer.</p> <p>Add another clause to Wire rope, slings and chain pulling 'Cable strength, available pulling capacity and connection details should be determined and documented prior to the proposed activity.'</p> <p>Clause 178 Can the relevant Australian Standards be nominated as it is unclear as to which ?.</p> <p>Clause 187 Question the use of the word 'engineer' used for one of the first times when previously it has been 'person of competence'. Why the change in wording?</p>
<p><i>PART 6 – Demolition of Special Structures</i></p>	<p>Clause 189 Add 'The above structures require supervision from a Registered Builder Practitioner – Builder-Demolisher in the appropriate class'</p> <p>Clause 195</p>

	<p>There is no mention of part of beam or floor demolition which occurs often. Eg Tendons must be securely re-bonded to maintain remaining structure.</p> <p>Clause 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.</p> <p>Clause 218 In Building façade retentions, consider support for cellar/basements. Refer Clause 205.</p> <p>Clause 222 Dot Point 3 Delete the word 'Acetylene' and replace with 'LP'. No one uses the above in Demolition. Also, after some bad incidents over past years, add 'ensure LPG bottles are not used in basements but are placed above in well vented area'</p> <p>Appendix B Demolition Plan pg 51 Add the sentence 'Is a requirement for a demolition permit' in the introduction paragraph (make it the second sentence?)</p> <p>'A demolition plan may include' Replace the word 'may' with 'should'</p> <p>Dot Point 8 Add 'and on roadway footpath closures'</p>
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