



SUMMARY OF KEY TOPICS

The following is a selection of key topics covered in this Newsletter and a brief description of the topic. Further detail is provided in the Newsletter.

EEA COMMITTEES PROVIDING SAFETY LEADERSHIP

Updates on the Safety Standards and Procedures Group (SSPG), National Committee on Live Work (NCLW) and Asset Management Group (AMG) are provided.

(SEE SECTION 2)

SPECIAL ITEM: SAFETY MANUAL – ELECTRICITY INDUSTRY (SM-EI) REVITALIZATION PROJECT

This year's review of the SM-EI will be different...

(SEE SECTION 3)

EEA SAFETY INITIATIVES

SSPG Business plan, relationship management, ESI Health and Safety Statistics, H&S Strategy, Asbestos Management and more...

(SEE SECTION 4)

EEA TECHNICAL GUIDES AND ADVISORY BULLETINS

DRAFT GUIDES

The EEA has prepared drafts of revised and new Guides

- Asset Criticality (Draft) for consultation
- Guide for Selection of LV Work Methods (Interim)
- Model Standard Procedures for Live Work (Draft) for consultation

(SEE SECTION 5)

NEW AND REVISED GUIDES

The EEA has published one new Guide and reviewed one other.

- Switching Instructions and Communications Guide
- Guide on Overlapping Duties under the Health and Safety at Work Act

(SEE SECTION 5.3)

EEA WORKSHOPS AND COURSES

NCLW: Live Work Forum 27th August (SEE SECTION 2.3)

SM-EI Workshops (SEE SECTION 3.5)

Safety Workshop 2019: 30th & 31st October

(SEE SECTION 6.1)

LEGISLATION AND REGULATORY UPDATE

NZTA, Building Amendment Bill, MBIE and WorkSafe information and updates.

(SEE SECTION 7)

SM-EI

Review, Clarifications...

(SEE SECTION 9)

ALWAYS CARRY OUT THE FOLLOWING WHEN THEY APPLY TO THE WORK TO BE PREFORMED:

- ① TEST for Safety
- ② ISOLATE, Prove De-Energised & Earth HV equipment prior to work
- ③ IMPLEMENT or apply safe work practices to live LV work
- ④ ENSURE protection from Voltage Difference
- ⑤ DETERMINE poles or pole structures are safe to climb
- ⑥ ENSURE fall arrest or restraint

1. INTRODUCTION	4
2. EEA COMMITTEES PROVIDING SAFETY LEADERSHIP	4
2.1 Industry Safety Leadership	4
2.2 Safety Standards and Procedures Group (SSPG)	4
2.3 National Committee on Live Work (NCLW)	5
2.4 Asset Management Group (AMG)	5
3. SPECIAL ITEM: SM-EI Revitalization Project	6
3.1 The 2019 SM-EI Review and Revitalisation Project – Overview	6
3.2 Scope and timeline of the Project	7
4. EEA SAFETY INITIATIVES.....	7
4.1 SSPG Business Plan	7
4.2 Back to Basics Campaign Update	8
4.3 Public Safety reporting	9
4.4 Accident and Incident Notices	9
5. EEA TECHNICAL GUIDES AND ADVISORY BULLETINS	9
5.1 Published Guides and Advisory Bulletins.....	9
5.2 Draft and Proposed Guides (Including Revisions)	10
5.3 Recently Released or Updated Guides or Advisory Bulletins	11
6. WORKSHOPS & COURSES	12
6.1 EEA Health and Safety Workshop	12
6.2 Overhead Lines Forum – North Island.....	12
7. LEGISLATION AND REGULATORY UPDATE	12
7.1 New Zealand Transport Agency (NZTA) Industry Voice Brings Changes to Restrictive Traffic Management Requirements.....	12
7.2 Building Amendment Bill.....	13
7.3 Overhaul for building legislation	13
7.4 Development of Regulations to Support HSW Act	13
7.5 WorkSafe Consultations	14
7.6 New Rules for hydrofluorocarbons.....	14
7.7 New Rules for Class 6 and 8 Hazardous Substances.....	14

7.8 Hazardous Waste Changes..... 15

8. GUIDES ISSUED BY REGULATORS AND OTHER PARTIES..... 15

 8.1 Clarifying Asbestos duties for body corporates 15

9. SAFETY MANUAL – ELECTRICITY INDUSTRY (SM-EI) 15

 9.1 SM-EI General 15

 9.2 Interpretations and Clarifications 15

1. INTRODUCTION

This Safety Rules Newsletter is published six monthly and provides an update on;

- Safety topics
- Safety rules requirements, issues and interpretations
- Live work topics

The Newsletter is a communication channel between the EEA and the industry practitioners who use the safety rules (SM-EI) as well as those who carry out live work. All users of SM-EI should be provided with access to or a copy of this Newsletter. The Newsletter also provides a brief update on the Asset Management Group activities. Previous Newsletters are available on the EEA website: [Safety Rules Newsletter](#). Any questions, suggestions and points for consideration are always welcome and should be sent to admin@eea.co.nz.

2. EEA COMMITTEES PROVIDING SAFETY LEADERSHIP

2.1 Industry Safety Leadership

The EEA President and the Executive Director are continuing their on-going programme to meet with industry senior executives to discuss safety leadership.

The EEA focus is to support the work of industry Safety Leaders - to enable a collective focus on critical risks; to collaborate with leaders to significantly improve safety performance across the whole electricity supply industry (better than the WorkSafe targets) ; and to provide a pan-industry framework to support the six Health and Safety at Work Act due diligence requirements of industry duty holders.

2.2 Safety Standards and Procedures Group (SSPG)

Key elements of the [SSPG Terms of Reference and a list of members](#) is on the EEA website.

In March 2019 the EEA Executive Committee appointed Graeme Johnson (Technical Manager- Electrix) as the new Chair of the SSPG to replace the late Harvey O'Sullivan. Tracy Evans-Tracy (Vector) and Jared Wilson (Downer) resigned from the group and their contributions are acknowledged and greatly appreciated.

Dick Thornton-Grimes (Vector) has been appointed to replace Tracy Evans-Tracy. He is an HSE professional with over 23 years of local and international experience in high risk organisations primarily in the pharmaceutical and chemical sectors. He has also worked for the New Zealand Fire Service as their national advisor for hazardous substances - being responsible for strategic hazmat management and operational advice.

Graeme Jackson (Downer) has been appointed to replace Jared Wilson. He started in the industry in 1979 as an apprentice electrician and is experienced in Line, Sub Stations Construction & Maintenance, faults, network control. He also ran his own electrical contracting firm for 10 years before returning to Downer/Tenix. He is currently Technical Services Manager at Downer.

The SSPG is working to deliver the outputs identified in its current Business Plan (2019-2020) as set out in section 4.1, along with any revised priorities.

All enquiries regarding safety and safety rules issues should be made to the EEA at admin@eea.co.nz.

2.3 National Committee on Live Work (NCLW)

The [NCLW role, scope](#) and membership information are available on the EEA website. The NCLW welcomes feedback from stakeholders and can be contacted through the EEA at admin@eea.co.nz.

NCLW focus over the last six months has been the development and drafting of fourteen model standard HV Live Line procedures using glove and barrier techniques. The consultation drafts of model procedures will be published in July 2019 and are a key discussion topic at the August EEA Live Work Forum.

The “*Guide for the Selection of Work Methods to undertake Low Voltage Work on Electricity Supply Assets*” has completed its consultation and review process and is now ready for publication.

The NCLW **Live Work Forum date is 27th August in Christchurch**, and we are currently constructing the agenda so would welcome suggested topics and presentations. Current topics areas to be included are;

- Glove and Barrier procedures
- Auditing of live work
- LV work management
- Presentations from members of the Australian HV Live Work

Other NCLW activities include:

- Reviewing and updating the *Live LV ‘Practice’ Guide*
- Supporting implementation of the Guide for the *Assessment of Work Methods to Undertake HV Overhead Line Work* and the EEA *Practice Note on ECP 46*
- Audit: Guidance on audit frameworks for live LV, HV and testing
- Work with the Australian HV Live Work Forum on a joint Australia/NZ Testing Standards for HV LL equipment
- Standards for training/maintenance of HV and LV LL competency
- Liaise with WorkSafe/MBIE and international Live Line Forums to ensure New Zealand (NZ) is aligned with industry best practice.

2.4 Asset Management Group (AMG)

The AMG role, [Terms of Reference and membership](#) information are on the EEA website.

In March 2019, the EEA Executive Committee appointed Dave Brannigan (Network Manager-Orion) as the new Chair of the SSPG to replace the Michael Whaley (Chief Engineer - Powerco who was appointed as Chair of the EEA Professional Development Working Group). Mike’s leadership and significant contribution to the work of the AMG is acknowledged and greatly appreciated.

The AMG have completed reviews of several key Guides including:

- Arc Flash
- Metering Guide
- Small Scale Inverter Connection Guide (Interim)

Copies of these Guide are available from the [publications section](#) of the EEA website.

The AMG current work priorities include:

- *'Asset Criticality Guide'* is currently out for consultation, with two workshops that were well attended by industry. The proposed guide will be covered at the Asset Management forum and at EEA Conference
- *'Power System Earthing Guide'*: Thanks to those that provided feedback, changes are being made and the guide is due to be published in September
- *'Asset Management for Resilience'* guide is now underway with a consultant engaged to develop the guide and working group selected to provide industry direction
- *Asset Management forum* will be in Auckland on the 24th and 25th June. This year's forum is focused around Assets, Opportunities and Innovation in the asset management aspect of the electricity business. The forum is designed and structured as workshops and panel discussions to prompt discussion and engagement on improving asset management practices in our industry, by sharing knowledge and fostering industry collaboration, there are lots of opportunities to ask questions throughout the forum

For further information contact admin@eea.co.nz.

3. SPECIAL ITEM: SM-EI Revitalization Project

SM-EI is the most extensively used of all industry documents. It provides guidance on an established system of uniform safe work practices for industry to use.

Since first published in 1995, the SM-EI has established common and consistent safe work practices and terminology across the three industry sectors - generation, transmission and distribution. It is the base set of guidance rules and procedures that are used by asset owners, contractors and trainers and is available to every worker.

The SM-EI is generally updated every five years. Most updates include an examination of the existing rules and additions and amendments as necessary. The last update was in 2015 when the SM-EI was aligned with the (then) new Health and Safety in Work Act 2015.

3.1 The 2019 SM-EI Review and Revitalisation Project – Overview

The key focus of the project is to update the safety content of SMEI.

As well, EEA is also taking the opportunity to revitalise the structure and delivery of SM-EI to ensure it is delivered in a way that meets the need of users and better supports implementation and common understanding of the 'why' and 'how' that underly the rules in SM-EI.

For this review EEA have set an aspirational goal of *"turning the SM-EI into a consumable industry body-of-knowledge owned and managed sustainably by the EEA for industry benefit"*.

The aim is reinforce and better support the value of the SM-EI as the “industry safety bible’ by putting the requirements, guidance and rules of the SM-EI into the hands of those that use them, in a way they want to use them, and to do this in a way that provides value-added benefits to users/stakeholders and Members.

The key drivers for the review are to ensure SM-EI’s currency/relevancy/quality; improve usability/access/utility; ensure sustainability of SM-EI; be future focused; and is effectively managed to ensure it meets the ongoing needs of industry.

The project is being championed by the SSPG and supported by the EEA Executive.

3.2 Scope and timeline of the Project

The project has three Workstreams and we have provided indicative timelines for the first. We will make further announcements and provide updates on these workstreams via our website and the EEA newsletters.

Workstream 1 - Options Analysis (March – November 2019)

Understanding how SM-EI is used by industry, whether directly or indirectly, so that we can improve the usability and the accessibility of its information to users.

Workstream 2 - SM-EI Content Review (July 2019 - February 2020)

A detailed review of the SM-EI content. The approach taken in this workstream supports collaboration and consultation with industry, under the guidance of the SSPG.

This will include industry engagement and input from subject matter expert and will likely involve several stages.

Workstream 3 - Sustainability and Future Management of SMEI (August 2019 – February 2020)

This workstream is to be considered in conjunction with Workstream 1 and Workstream 2.

4. EEA SAFETY INITIATIVES

4.1 SSPG Business Plan

The other key outputs for the SSPG, as per its [Business Plan](#), for 2019 are:

Health and Safety Strategy

SSPG will produce a review report of our performance against the strategy for publication in 2020. Concurrently, they will develop in collaboration and consultation with industry a new strategy for 2020-2025.

ESI Health and Safety Statistics

Each year the EEA collects data from our members for making industry comparisons about health and safety performance. The data collection process begins in August and is usually able to be analysed and published by November. The report and benchmarks support CEOs and boards of participating members to see how their organisation is performing against the rest of the industry.

Planned New Publications

- Guide for LV Works Management Systems
- Quick Guide for the Management of Critical Risks
- Case Study - Management of Asbestos Contaminated Dust

Planned Publication Review/Updates

- Safe Practices for Low Voltage Electrical Work (2012)
- Guide for Livening of Service Connections to Premises (2010)
- Blue Indicating Silica Gel (2013)
- Management of electrical safety for utility arborists near overhead electric lines (draft)
- Electrical Safety for Forestry & Woodlot Logging Operations (2013)

Joint Initiative with Genesis Energy on Asbestos Management

In collaboration with Genesis Energy, SSPG will oversee the production of a case-study on the development and validation of a method for estimating the risk of asbestos-contaminated dust in workplaces.

Relationship Management

SSPG will routinely engage with CEOs, StayLive, EDI H&S forum, WorkSafe New Zealand, MBIE, and other key stakeholders in relation to key issues and work. The purpose of these relationships will be to maintain visibility, consult, collaborate, coordinate and cooperate on our respective work programmes.

4.2 Back to Basics Campaign Update

Back to Basics remains an underlying focus for the EEA. Incident information from industry reinforces the value of getting the basics right. The *'Non-Negotiable Safety Requirements'* adopted by the EEA are listed on the inside cover of the SM-EI books, being;

- 1 Test for safety
- 2 Isolate, prove de-energised and earth HV equipment prior to work
- 3 Implement or apply safe work practices to live LV work
- 4 Ensure protection from voltage difference
- 5 Determine poles or pole structures are safe to climb
- 6 Ensure fall arrest or restraint

There are [dedicated pages on the EEA website](#) and it is intended to provide links to EEA member company activities that support the initiative. The resources including logo's and supporting material such as a flyer and poster are available through the link above.

EEA will review the campaign in 2019/2020 to identify opportunities to refresh the campaign and produce new materials.

4.3 Public Safety reporting

The joint EEA/ENA [Public Safety Working Group](#) has agreed to continue gathering high-level leading and lagging measures relating to public safety. Historical data from Energy Safety provide trends for 1998-2015.

Data collection for the next version of the report will begin in July, at which time the nominated contacts for the participating companies will receive return forms for their data along with instructions.

4.4 Accident and Incident Notices

Reported Events

Reports of [accidents and incidents](#) are posted on the EEA website. Readers are reminded to check the EEA website periodically for new notices (*access through an EEA member is required*). Readers need to ensure they review the posted reports to identify any hazards that affect their assets or methods of working.

Reporting New Events

To be able to publish accident and incident notices the EEA needs to be notified of their occurrence. Businesses are encouraged to ensure that they are providing summary information to the EEA so that relevant information can be disseminated to industry. Business identification is not published unless by agreement, and the EEA website limits access to the reports to '*Members only*'. The EEA has a [Safety Alert Reporting Template](#), which enables quick provision of information.

5. EEA TECHNICAL GUIDES AND ADVISORY BULLETINS

5.1 Published Guides and Advisory Bulletins

EEA Guides convey principles and minimum accepted practices as a means of conformance to regulatory and SM-EI requirements. Employers are responsible for providing a comprehensive work management system that identifies and controls hazards and risks, details safe work procedures, and that ensures employees are competent, equipped and adequately supervised to carry these out with safe outcomes. EEA Guides are suitable for information, as a training resource, and for the review or development of employer work procedures specific to the work management system.

EEA Guides are not intended as specific work procedures in their own right, although in certain circumstances they may state that they may be used as a procedure. Published Guides are on the EEA website at: [Publications](#).

5.2 Draft and Proposed Guides (Including Revisions)

Draft Guides

Asset Criticality

The EEA has developed an industry *Draft Asset Criticality Guide* for consultation. This Technical Guide, Asset Criticality is intended to represent the relative seriousness of failure considering consequences in the following categories:

- Safety
- Customer service levels
- Direct costs
- Environmental impact

Criticality analysis results can be used to support

- Reliability-centred maintenance – establishing an optimised programme of maintenance activities and intervals
- Critical spares review
- Cost benefit analyses – analysing replacement options using both financial and nonfinancial criteria
- Prioritisation of asset renewal – where risk across several assets is similar, but budget constraints limit how many assets can be renewed, prioritisation can be based on criticality

Industry consultation workshops were held on 28th and 29th May to learn and understand the content of the guide, how the guide can be applied, and to provide direct feedback.

Consultation on the draft closes on 28th June 2019.

Guide for Selection of LV Work Method

The NCLW has prepared a *Draft Guide for the selection of a work method for LV*. The Guide is based on the same principles as the HV Guide, i.e. determining when to work live.

The Guide has been prepared to assist PCBUs within the electricity supply industry to apply a transparent structured risk assessment approach to determine the appropriate work method to undertake Low Voltage work. Specifically, to help determine, based on a balance of risk, the selection between a de-energised work method or a live work method to undertake work on LV lines, cables or associated equipment. In both cases, the work method must be selected in accordance with the requirements of the HSW Act.

This guide is in the final stage of preparation and will be published shortly.

Draft Model Standard Procedures for Live Work (Glove and Barrier)

The NCLW is preparing a draft set of model national procedures for Glove and Barrier procedures relating to common live work activities. The draft procedures under consideration will be consulted with stakeholders shortly and include:

- Replace (remove & install) an OPEN air break switch (ABS) using one mobile elevating work platform (MEWP)
- OPEN ABS Maintenance
- Replace CLOSED ABS
- Maintain a 3-Phase ABS up to 33kV
- Energise a Single or 3 Phase Overhead Line up to 33kV at a Pole (more than/less than 1.6 km)
- Install Temporary inline isolator
- Install Fused (Drop Out Fuse (DOF's)) In-Line Temporary Break
- Replace Pin or Post Insulator on an Intermediate Pole up to 33kv
- Connect DOF or Isolator Up to 33kV
- Replace DOF/Isolator CLOSED
- Tighten Line Hardware
- Loss of Conductor during Live Line Glove Barrier Work
- Replace a Non-Tension Connection or Jumper

Further engagement work is planned to test the content of the final draft with industry before publishing.

Maritime New Zealand (MNZ) and EEA Guide to Safety Management for Power Line Crossings of Navigable Waterways and Slipways

Following discussions with Maritime New Zealand, the EEA has agreed to pass the responsibility for this guide to them. This is a better fit when considering the intended audience.

Proposed Guides

The EEA, SSPG, NCLW and AMG identify in their Strategic Plan and current work-plan the Guides and publications which are a priority for review or preparation.

5.3 Recently Released or Updated Guides or Advisory Bulletins

The EEA has published one new safety guide and reviewed one other since the previous Newsletter.

Switching Instructions and Communications Guide

A new Guide on switching instructions and communications has been completed. The Guide is intended for control engineers, supervisors and those involved in switching operations.

The Guide sets out the essential safety principles for switching instructions and associated communications and guides competent workers in the Electricity Supply Industry (ESI) on how to consider and control risks inherent with switching operations.

The Guide applies to;

- the compiling, checking and actioning of switching instructions for;
 - Switching of HV equipment,
 - Earthing of HV equipment
 - Application of issuer applied safety measures for permits and assurances.
- protocols for communicating the steps when the instructions are being actioned.

Guide on Overlapping Duties under the Health and Safety at Work Act

This Guide applies to electricity supply industry (ESI) activities with respect to the duty to consult, co-operate with, and co-ordinate activities with all other businesses which have a duty in relation to the same matter. The duties may arise from activities which the ESI business has initiated or they may be in response to activities initiated by another business working in the vicinity of ESI assets or a worksite. The activities covered include those arising from a supply chain to those arising from one-off contracted supply.

This guide was first published in March 2018 as an interim guide. Following consultation earlier this year, the guide is no longer interim although no further development of the guide was needed.

6. WORKSHOPS & COURSES

6.1 EEA Health and Safety Workshop

The EEA Safety Workshop for 2019 is to be held in **Wellington on 30th and 31st October**. The SSPG are in the process of planning the workshop, including identifying speakers and topics. If you are interested in presenting, or have a suggestion for a presenter, please feel free to get in touch. In the meantime, we expect to start putting up information about the workshop in August. You'll also see it advertised on our website, LinkedIn, and in our newsletter once we are ready to accept registrations.

6.2 Overhead Lines Forum – North Island

This event is intended for overhead line designer's and asset engineers from networks in the North Island. The forum may also be of interest to those who work in the management of overhead line assets. The forum has no charge as it is being sponsored by Powerco.

Further information and/or to register for the Forum download the [Forum flyer here](#).

7. LEGISLATION AND REGULATORY UPDATE

7.1 New Zealand Transport Agency (NZTA) Industry Voice Brings Changes to Restrictive Traffic Management Requirements

In April, NZTA issued an interim decision on traffic management that affected maintenance work in our industry. This short notice step arrived without warning or consultation.

The EEA is happy to report that industry representation by us, backed by the ENA, has resulted in changes. Crucially, the new notice states in the 'Scope' section that:

"This does not include work activities that are carried out by third party asset owners, utility providers or other road controlling authorities. These PCBUs may continue to undertake their work activities using the CoPTTM Edition 4 November 2018 for their TTM requirements on Level 1 State Highways."

We interpret this as meaning maintenance contractors may return to carrying out their work activities on Level 1 State Highways as they were prior to the issuing of the 1st April Interim Safety EED.

The new notice does go on to encourage other PCBU's *"...to review these requirements and where appropriate adopt them across their operations."*

Further changes may be made but these are now unlikely to take place so quickly or without adequate consultation.

7.2 Building Amendment Bill

This bill amends the Building Act 2004 and proposes two new sets of powers to improve the system for managing buildings after an emergency and to provide for investigating building failures. The Bill is currently before the Select Committee and was to be reported back by 5th April (an extension was agreed by the Business Committee).

7.3 Overhaul for building legislation

MBIE recently consulted on a discussion paper on the building system legislative reform programme. The aim is to establish an efficient building regulatory system that encourages innovation, while ensuring buildings are safe, healthy and durable. Significant legislative change is required to achieve these goals.

The proposed reforms will be the most far-reaching changes since the current Building Act was introduced in 2004.

The reform package covers five key areas:

- building products and methods
- occupational regulation
- risk and liability
- the building levy
- penalties.

Submissions on the discussion paper closed on 16th June.

7.4 Development of Regulations to Support HSW Act

The Ministry of Business, Innovation and Employment (MBIE) has posted new information on the development of regulations to support the HSW Act. The specific information is accessible at: [Health and Safety Reform](#).

The information is a statement of intent rather than detail, and indicates the areas which MBIE will focus on. It also indicates that the reform is still a multi-year programme. The information advises that MBIE has worked with WorkSafe and key stakeholders to identify the initial priority areas, which are;

- Plant and structures, including:
 - working at heights and excavations
 - work machinery, equipment and tools
 - mobile plant such as tractors, quad bikes and elevated work platforms
 - existing regimes for boilers, cranes, fairground rides etc

- Risks for young people doing hazardous work
- Mining and quarrying (post-implementation review)

MBIE expects to publish a discussion paper on the Plant & Structures regulations early in 2019.

7.5 WorkSafe Consultations

WorkSafe is currently consulting on:

Proposed changes to Workplace Exposure Standards and Biological Exposure Indices

WorkSafe is proposing changes to the [WES of 34 substances and the BEI of one substance](#).

After consultation, WorkSafe will consider the submissions in the WES & BEI review. When a decision is made it will be published in the WES & BEI book at the end of this year.

Please note that submissions close at 5:00 pm on 7 August 2019. WorkSafe will not be accepting submissions in any format other than through their online form.

Proposed Safe Work Instruments

Worksafe are consulting on [three proposed safe work instruments](#) (SWIs) to support the Health and Safety at Work (Hazardous Substances) Regulations 2017.

The proposed SWIs are required to specify additional design standards for cylinders, a new standard for low-pressure fire extinguishers, and a standard for the design and construction of above ground stationary tanks.

Please note that submissions close at 5:00 pm on 5th July 2019. WorkSafe will not be accepting submissions in any format other than through their online form.

7.6 New Rules for hydrofluorocarbons

Applications for special permits for the import of hydrofluorocarbons close on 1st July 2019, and 1st September 2019 for grandfathered permits. From 1st January 2020, all imports, transshipments, and exports of specified hydrofluorocarbons will require a permit from the EPA. You need to apply in 2019 for these permits. If you export hydrofluorocarbons in the calendar year (from 2020 onwards) you may be eligible for an exporter's import permit to replace the quantity exported. Export permits, exporter's import permits, import permits for recycled hydrofluorocarbons, and exemptions for transshipments may be applied for in 2020. You can find out more on the [EPA website](#).

7.7 New Rules for Class 6 and 8 Hazardous Substances

From 1st June if you are over the thresholds for class 6 (Toxic) and class 8 (corrosive) substances, you'll need to have established a hazardous substance location (HSL). HSLs must meet specified construction and capacity requirements depending on what is being stored in them. They also need to be separated from public and protected places by minimum distances which will depend on the classification of the substances and amounts being stored.

For more information please go to the [Hazardous Substances](#) newsletter on the [WorkSafe website](#).

7.8 Hazardous Waste Changes

From 1st June, most of the rules for the safe use, handling and storage of a hazardous substance will also apply to hazardous waste with the same hazardous properties. Hazardous waste is waste generated from manufacturing and industrial operations that is likely to be or contain at least one hazardous substance that is, explosive, flammable, oxidising, toxic or corrosive. In other words waste that comes from work involving a hazardous substance is likely to be hazardous.

For instance, you will need to include any hazardous waste you use or store at your site in your inventory and label any containers that hold hazardous waste.

8. GUIDES ISSUED BY REGULATORS AND OTHER PARTIES

8.1 Clarifying Asbestos duties for body corporates

A new asbestos fact sheet has been published by WorkSafe entitled [Asbestos and a body corporate](#). This fact sheet covers a body corporate's duty to identify and manage asbestos. The fact sheet covers asbestos management plans, and when these may be needed, responsibilities when more than one PCBU is involved, the types of work that might create a risk, and how to identify asbestos. For more information please go to the WorkSafe website: [Asbestos and a body corporate](#). WorkSafe has published a guide for small business owners on how to manage health risks in the workplace. The guide includes examples of the [Plan-Do-Check-Act](#) process to identify, assess and manage common health risks, such as fatigue, noise, and sun exposure.

9. SAFETY MANUAL – ELECTRICITY INDUSTRY (SM-EI)

9.1 SM-EI General

An electronic version of SM-EI is available. Details can be found on the EEA website: [SM-EI Electronic version](#).

9.2 Interpretations and Clarifications

No formal interpretations relating to SM-EI matters have been issued since the previous Newsletter (*Formal interpretations are posted on the EEA website at: [SM-EI Interpretations](#)*).

N.B. SSPG has noted a substantial reduction in both the requests for and production of interpretations and clarifications, although there are still inquiries. We believe this is consistent with the maturity of the current version, which was introduced in 2015.

In addition, a number of requests for comment or guidance have been received and responded to. A summary of the interpretations and clarifications, and the advice provided, is as follows;

Interpretations - Nil

Clarifications - Access and Test Permits, separate pieces of equipment on the same pole

Q1. What is the replacement period for helmets?

I have been told that our replacement period for helmets (which is 5 years from issue) is based on EEA guidance; however, I have not been able to put my hand on a document that lays this guidance out.

SSPG Response

SM-EI part 2.1303 refers to other standards for further guidance on safety helmets, one of which is AS/NZS 1800:1998. In that standard, at section 3.4 you'll find information about the working life.

Q2. What PPE is required in a HV switch yard where personnel are accessing the yard, but no actual 'work' is being done?

Rule 2.1311 c.i. states "For work in the vicinity"

Rule 2.1311 c.ii. states "For work on or with direct exposure to live conductors"

SSPG Response

Not every term in EEA guidance needs to be defined, as is the case here. This is because some terms have common meanings, and others are more appropriately defined in legislation. The term "work" has a common meaning, although it's meaning is also inferred from the usage and application of related terms such as "worker", "workplace" and "at work" that are found within HSWA. It has also been thoroughly explored in caselaw, and the short version of that is that as far as we are aware of no business has successfully avoided their duties to a worker who was lawfully at work at the time of their accident, by arguing that the worker was not technically working and just happened to be in the area.

SM-EI clearly explains how to keep workers safe in the circumstance that they are working on a live conductor, and in the circumstance where they are in the vicinity (which is intended as a catch-all).

Whether or not they are carrying out 'work' in the area is irrelevant to how they need to be kept safe.

For those entering a switchyard with no intention of undertaking 'work' and remaining outside all Permitted areas and MADs then the rule 2.1311 c.i can be applied, however – if a company requires a higher level of PPE as per rule 2.1311 a, then that must be adhered to. The PPE should also be selected after a risk assessment of the activity being undertaken.

EEA SAFETY STANDARDS AND PROCEDURES GROUP (SSPG) | JUNE 2019

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