

By post and by fax at 2940 6251

30 December 2013

The Occupational Safety and Health Training Centre
Labour Department
13/F, City Landmark I
68 Chung On Street
Tsuen Wan, New Territories

(Attn: Mr TSANG Chiu-wang)

Dear Mr TSANG

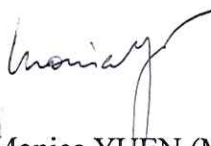
Views on Consultation on the Testing of Anchor Device for Attachment of Safety Belt

Thank you for your letter of 29 November 2013 inviting the Institution to put forth our views on the captioned subject.

In response to your invitation, we are pleased to provide herewith our views and suggestions on the subject for your consideration.

Thank you.

Yours sincerely



Monica YUEN (Mrs)
Chief Executive and Secretary

Enc

MY/WC

Enclosure

**Views from the Hong Kong Institution of Engineers on
Consultation on the Testing of Anchor Device for Attachment of Safety Belt**

Introduction

The Hong Kong Institution of Engineers (HKIE) supports the initiative of the Administration to introduce an effective mechanism to improve the safety and quality of Anchor Devices for Attachment of Personal Fall Protection Equipment for Truss-out Bamboo Scaffolds through a registration system of Competent Person.

2. We are of the view that the proposed provision of certification of competence course for the selection, installation, use, inspection and testing anchor devices for attachment of personal fall protection equipment for truss-out scaffolds serves a good means to enhance the construction practitioners with better understanding and knowledge on safety and proper standard of the operation for anchor bolt installation and testing. However, we suggest to consider expanding the scope of the registration system of Competent Person and the training course to cover work on fixed working platform or mobile metal scaffolding as well. Also, the legal liability of the Competent Person should be clearly stated.

Views on the Proposed Training Course (Appendix I)

3. It is considered that the draft lesson plan of the proposed training course is well structured, that includes Theoretical Lesson, Practical Lesson, Theoretical Examination and most importantly, the Practical Assessment on individual basis with clear acceptance criteria that the candidate is able demonstrate to the assessor the installation of anchor device of any type as requested by the assessor.

4. Regarding the trainees for the proposed training course, the HKIE believes that the proposed training course should be widely extended to engineering grade personnel who hold academic qualifications and experience in civil, building, structural, mechanical and marine disciplines etc, so as to promote more safety awareness on the subject. In particular, we suggest that Associate Members of the HKIE in these relevant disciplines admitted through professional assessment, or equivalent engineering technologists with professional qualifications, should also be qualified for application.

5. Meanwhile, it is suggested that in order to gain the confidence of the industry and the public, the assessors of the proposed training course should be with recognised qualifications in relevant engineering discipline, such as the professional engineer level of structural discipline to align with the "Guidance Notes on Classification and Use of Safety Belts and their Anchorage Systems".

Views on the Safety Guidebook for the Selection, Installation, Use, Inspection and Testing of Anchor Devices for Attachment of Personal Fall Protection Equipment for Truss-out Bamboo Scaffolds (Appendix II)

6. The HKIE has the following suggestions and views in regard to the captioned document as elaborated below:

- i. It is noted that there may be some areas of inconsistency between the BSEN standard, BS standard and this draft Safety Guidebook, which worth further clarification to address such inconsistency.
- ii. A mechanism for disciplinary actions and appeals is suggested to be established and included in the captioned document.
- iii. The suggested format in Appendices B, C and D should be formalised as prescribed forms, and the content of which should be simplified. Warning note for offence of false statements should be included in the footnotes of the forms as reminder. The duration of record keeping for such prescribed forms of installation, inspection, and examination should be maintained for a specified period of time.
- iv. It is suggested that documents related to anchor devices for installation instructions supplied by the manufacturers should be kept and maintained in record and provided upon requested for inspection.
- v. It is also suggested that the test for anchor devices (bolt) installation for truss-out scaffolds should be included.

7. Please also refer to the table in the Appendix for our further comments on the draft Safety Guidebook and the Proposed Plan related to fixed anchor devices of safety belt for consideration.

Page	Section	Item	Comment/ Suggestion
19	5.4	Materials and Design Aspects <ul style="list-style-type: none"> • COP PD6484 • Anchor bolt should be designed and tested by a Professional Engineer 	<ul style="list-style-type: none"> • More information for COP PD6484 is suggested to be provided. • Please clarify if the anchor bolt examination should only be handled by the professional engineer (rather than the holder of certificate of competence for installation of anchor bolt).
21	6.2	3 types of different drill-in anchors <ul style="list-style-type: none"> • Torque controlled • Displacement controlled 	<ul style="list-style-type: none"> • Please clarify what the third type of drill-in anchor is.
37	9.6	Certification of independent lifeline	<ul style="list-style-type: none"> • Please elaborate the standard that the independent life rope should comply with.
38	11	<ul style="list-style-type: none"> • Anchor Devices Marking Requirements • Provide with building owner and written instruction for use • Label for next examination 	<ul style="list-style-type: none"> • It is suggested that the sample of marking devices conforming to EN 365 is required to be provided for information and standardisation. • Please elaborate the kind of format for written instruction to the building owner for use, and advise whether the arrangement is also applicable for construction sites. • It is suggested to design a standard format for labeling.
39	12	Conclusion <ul style="list-style-type: none"> • Competent person in different functions 	<ul style="list-style-type: none"> • Please clarify whether it requires the same competent person for installation, inspection and examination or

Page	Section	Item	Comment/ Suggestion
		appeared at least two times	whether different competent persons are allowed.
41	Reference		<ul style="list-style-type: none"> It is suggested to include the Building Department's Guidelines on the Design and Construction of Bamboo Scaffolds.
Appendix A 1	Note	Note: Class A Anchor Devices in BS 7883:2005 is equivalent to Type A Anchor Devices in EN 795:2012	<ul style="list-style-type: none"> Please elaborate if there is any difference between Class A and Type A. Please also elaborate if there is any difference on this part with the content of Item 5.5 in p.19 of the draft Safety Guidebook.
Appendix A 14	7.1.2	At least once every 12 months each anchor device should be subjected to a periodic examination	<ul style="list-style-type: none"> Please consider if there may be any discrepancy with other existing practices which require more frequent examination (e.g. 3 months).
Appendix B		Anchor Bolt (Eyebolt) Inspection and Testing Report	<ul style="list-style-type: none"> This inspection and testing report form should not limit to eyebolt, and should be extended to truss-out scaffold installation. Please specify and clarify the one who should certify the anchor bolt installation in the truss-out scaffold is in accordance with safe standards. It is suggested that the spacing distance between anchor bolt

Page	Section	Item	Comment/ Suggestion
			<p>and edge should be specified within a dimension range rather than the BSEC standard or manufacturer's requirements.</p> <ul style="list-style-type: none"> • A warning note for false statement of reporting is suggested to be included in the footnotes. • It should be set as a prescribed form with a serial number for record and the form should be kept for a reasonable time for inspection and proof. • The wording of "sound materials", "sound construction" and "adequate strength" should be specified clearly and quantified for measurement and description.
Appendix C		Anchor Device (Eyebolt) Regular Inspection Report	<ul style="list-style-type: none"> • Suggest to clearly mark "not exceeding 14 days immediately preceding each use" in obvious location. • Please refer to comments for Appendix B.
Appendix D		Anchor Device (Eyebolt) Periodic Examination Report	<ul style="list-style-type: none"> • Suggest to clearly mark "Re-test" and "at least once in every 3 months" in obvious location. • Please also refer to comments for appendix B.

Page	Section	Item	Comment/ Suggestion
Annex III			
1	Para 1	Scope of work for CP <ul style="list-style-type: none"> Limited to solid concrete or steel load-bearing structures 	<ul style="list-style-type: none"> It is suggested to include external, masonry wall with min 225 mm thick.
1	Para 1	<ul style="list-style-type: none"> Not allowed to conduct certification of other structure. 	<ul style="list-style-type: none"> Please also consider if the anchor bolt installed at mild steel bracket for truss-out scaffold can be included.
2	Para 3	Registration mechanism of CP	<ul style="list-style-type: none"> Please consider to extend to engineering professionals in related disciplines having competency with anchor bolt training for inspection, testing and certification of the anchor bolt.
2	Para 4	Notification	<ul style="list-style-type: none"> Please specify the prescribed form(s) for such notification. It is suggested to provide the standardised design of relevant warning notices and load notices.