



SafeNet Thought for the Day

19 February 2010

Does the removal of asbestos roof sheets constitute asbestos demolition work?

We have always maintained that the removal of asbestos roof sheets or the replacement of a few old or broken roof sheets does not constitute asbestos demolition work. Our opinion was based on the fact that the Asbestos Regulations as promulgated under the Occupational Health and Safety Act, 1993 defines demolition work as *“Includes demolition, alteration, stripping, removing, repair, gleaning of any spilt asbestos, or high-pressure water jetting of any structure containing asbestos lagging or insulation, **but does not include work performed on asbestos cement sheeting and related products and asbestos cement products that form part of the structure of a workplace, building, plant or premises”**”*.

It is clear that the definition excludes any work performed on asbestos cement sheeting or related products. The definition has however been a topic for debate for some time and it was clear that the Department of Labour interpreted the definition differently as they have for some time now asked that all the legal requirements be complied with even when old or broken asbestos containing roof sheets are removed.

On the 25th of November 2009 the Chief Inspector issued a memo explaining their interpretation of the legislation. The memo clearly states that the definition will be interpreted as per the contents of the memo until such time that the legislation has been amended. In short the memo states that any work requiring that asbestos containing roof sheet be removed will be classified as asbestos demolition work. All legal requirements as per Asbestos Regulation 21 titled Asbestos Demolition will apply. The only exclusion to this rule would be work done on asbestos containing products where the product is not removed, or where no asbestos fibres are released.

The memo does not exclude the removal of only one or a few roof sheets and for this reason the Department of Labour will enforce the following requirements even should only a small section of asbestos containing roof sheets be removed:



1. The removal of the roof sheets may only be done by a Department of Labour Registered Asbestos Contractors. These contractors would employ staff specially trained in the handling of asbestos and the precautionary measures to be taken when working with asbestos. There is in all probability not more than 5 or 6 Registered Asbestos Contractors active in the Western Cape;
2. A plan of work must be compiled by a Department of Labour Asbestos Approved Inspection Authority. SafeNet obviously being the service provider of choice. The plan of work must be submitted to the local Department of Labour's office at least 14 days prior to the commencement of the asbestos demolition work. The Department of Labour guidelines on asbestos demolition require that a host of issues be addressed in the work plan including measures implemented to decontaminate the area and people who enter the area. In most cases a decontamination unit would be required which consist of a clean and dirty change room with showers between the two change rooms; and
3. Air monitoring must be conducted during the demolition process as to determine the presence of airborne asbestos fibres. The monitoring may only be conducted by a Department of Labour Asbestos Approved Inspection Authority.

Complying with above mentioned requirements when removing or replacing roof sheets irrespective of the quantity may not only be expensive but would in all probability also result in delays due to work plans having to be drafted and be submitted to the Department of Labour.

See attached the memo issued by the Department of Labour.

Enjoy your weekend
The team at SafeNet

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