



2006 Draft Revised Edition  
Approved Code of Practice for Safety in Tree Work – Part Two: Maintenance of Trees Around Overhead Electric Lines

CONSULTATION COMMENT FORM

Please complete and return this form to [bernard@eea.co.nz](mailto:bernard@eea.co.nz) by no later than Wednesday, 31 May 2006

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GENERAL COMMENT:

Orion welcomes the opportunity to submit on the *approved code of practice for safety in tree work part two: maintenance of trees around overhead electric lines (the draft code)*.

We support the intent of the draft code to align with other industry legislation, regulations and safety standards. In particular, it is important that the safety distances identified in the draft code reflect the distances identified in the Safety Rules: Electricity Industry (SR-EI) (parts 1,2 and 3). Any departure from these requirements would add unnecessary confusion.

Our comments on specific provisions of the draft code are outlined below.

**SPECIFIC COMMENT:** Please quote the exact clause, paragraph, section, figure or table number, or where there is no number, the section heading (eg. "About this Code"), and page number, as appropriate. Please use a new row for each comment. Please remove any unused rows, or insert additional rows as required.

Clause/Paragraph/Section/Figure/Table No	Page No	Recommended Changes and Reason (exact wording of recommended changes should be given)
<b>Definitions</b>	10	We recommend that references to 'service mains' be removed. We understand the objective of the code is to focus on worker safety around vegetation growing near overhead power lines. We would expect the same worker code requirements to apply to any overhead power line, regardless of ownership or location. The term 'service main' can be defined in many different ways and adds unnecessary complexity for a utility arborist.
<b>Section 1</b>	12	
<b>Part B section 2.1(i)</b>	50	
<b>Part B section 8</b>	63	We consider that the transition period for compliance is too short to practically achieve the outcomes required by the code. These outcomes include identifying competent trainers and their availability, as well as ensuring that the necessary training requirements are met. We suggest that a two year period would be realistic to become fully compliant.
<b>Section 2.1.1(i) of part A</b>	17	<p>We consider service providers must be responsible for their own safe procedures and that asset managers should not be responsible for instructing service providers how to carry out their work. The draft code currently places some obligations on asset owners to approve work procedures. These obligations may lead to micromanagement of tree cutting for no real benefit.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>➤ section 2.1.1(i) of part A provides that <i>vegetation that is at or inside the Utility Arborist minimum approach distance or that touches the overhead electric lines shall only be cleared in accordance with the Asset Manager's instructions</i>. It may be more appropriate to replace 'instructions' with 'permission' to remove any ambiguity about the scope of the asset manager's involvement.</li> <li>➤ section 4.2.2(c)(iii) of part A provides that <i>...the Service Provider or Utility Arborist shall liaise with the Asset Manager who shall determine the procedures to be followed</i>. We suggest that the asset manager should not determine the procedures in this instance, and that the section should be amended to delete <i>who shall determine the procedures to be followed</i>.</li> <li>➤ section 4.2.2(d) of part A provides that <i>where the Asset Manager opts for the use of insulated toll procedures....</i> We suggest that 'opts' should be replaced with 'allows'.</li> <li>➤ section 6.4.1 of part A provides that <i>the Asset Manager's approval shall be obtained for the work to be carried out</i>. We recommend that 'approval' be replaced with 'permission'.</li> </ul> <p>We consider that the appropriate intent for developing and proving work procedures is outlined in section 4 of part B.</p>
<b>Section 4.2.2(c)(iii) of part A</b>	28	
<b>Section 4.2.2(d) of part A</b>	28	
<b>Section 6.4.1 of Part A</b>	38	
<b>Section 2 of part A</b>	17	<p>We have concerns about some of the provisions in section 2 of part A. In particular:</p> <ul style="list-style-type: none"> <li>➤ 2.1.1(e) provides that <i>all overhead electric lines shall be considered live unless the Asset Manager has formally stated otherwise</i>. While we accept that it is important that</li> </ul>

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		<p>asset managers communicate the status of their lines, it is equally important that the worker confirm when a line is not livened, through identifying visual earths. This practical check should be incorporated into the draft code, to offset the risk of a miscommunication by the asset manager.</p> <ul style="list-style-type: none"> <li>➤ 2.1.1(f) provides that <i>Utility Arborists doing vegetation control work shall at all times work from a position of earth potential.</i> This is impractical if the arborist is working from a fibreglass bucket.</li> <li>➤ 2.1.1(k) states <i>Apply the required earths to EWP's and trailer attachments before commencing vegetation control work. Where it is considered impractical to apply earths for any reason, consult with the Asset Manager before proceeding with the work.</i> It is important that vehicle earthing requirements align with the current EEA earthing code.</li> </ul>
<b>Section 2.2.8 of part B</b>	51	We consider that the appropriate traffic control measures are those of the local roading authority. Those measures would capture the Transit requirements, as appropriate to the local conditions.
		Operational emergency conditions need to be addressed. Minimum requirements for emergency removal of branches and vegetation by power company operators should be included in the draft code.