

# **Guidance Documents**

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# GD 09 FALL PROTECTION ANCHORAGE STANDARDS, EN 795 2012 AND CE MARKING

## For the latest position on CE marking please see https://mcrma.co.uk/ce-marking/

#### SUMMARY

- New EN795 Standard; limited to single users and to devices that can be removed from the structure.
- Forthcoming technical specification document (CEN/TS 16415: 2012) covers multiple users.
- 'As built' whole roof system testing advised.
- New MCRMA Safety Lines Group.

## INTRODUCTION

Roofing technologies continue to develop alongside new trends in the market for example, the current growth in use of renewable energy technology systems, such as photovoltaic panels (PVs) making it important that the specific requirements for roof access and maintenance are fully understood. With falls from height still accounting for 14 per cent of major injuries sustained in 2011/12 (cf The Health and Safety Executive Statistics 2011/12) it is often too apparent that safe work at height is not always considered from the outset.

An effective 'personal' fall protection system requires three essential elements – a harness, an interconnecting device (product or assembly e.g. lanyard) and an anchor. Failure in any one element can have catastrophic consequences.

To help mitigate such risks, a series of 'trans' European Normative Standards (ENs) have evolved which have been agreed amongst experts representing member states and implemented under the auspices of The Directive on Personal Protective Equipment (PPE) (89/686/EEC). The latter effectively serves to set and validate minimum standards and enable conformity through use of a visible CE mark.

#### A BRIEF GUIDE TO THE CURRENT RULES & REGULATIONS

Despite the best intentions, by definition the PPE Directive related to 'personal' protective equipment i.e. products that are 'worn or held' and so never *really* applied to permanently fixed anchorages, effectively preventing the application of a CE mark. Recognising that this situation left decision makers in a difficult position, some member states (the United Kingdom included) adopted a 'presumption of conformity' which enabled CE marking (subject to notified body validation) of anchorages against EN795 1997 Class A1, A2, C and D standard(s). Thus, many permanently fixed anchorages, including horizontal lifelines (Class C) have been subjected to a basic validation process and are CE marked accordingly.

A subsequent (2010) ruling effectively withdrew the right for this 'presumption of conformity' which coupled with the recent release of an updated and significantly amended standard (EN795 2012) has caused much confusion.

#### THE 'NEW' EN795 STANDARD

The 'new' EN795 standard is now limited in scope to single users and to devices that can be removed from the structure. Importantly, a separate Technical Specification document (CEN/ TS 16415: 2012) addressing the needs for multiple users on such systems is due for imminent release.

The 'new' standard also contains significant technical enhancements including:

- The need to design and test for fall arrest even if the product is offered for fall restraining purposes
- Enhanced dynamic and static testing
- Guidance on acceptable minimums in respect of the provision of information by manufacturers and installers.

Some debate remains around definitions of which components or parts of assemblies are structural (permanently fixed) and those which are not (can be removed), as for example, some conforming roof anchors can be removed in full from some types of roof (standing seam - clamped) but are essentially permanent on others (built up membrane – fixed with toggle or fixture and weatherproofed). Both types of roof anchor are essentially the same in form and function – but differ in relation to the fixing substrate and removability.

#### ENSURE THAT THE INSTALLED PRODUCTS ARE SUITABLE FOR PURPOSE

The EN795 2012 standard combined with the anticipated Technical Sheet (CEN/TS 16415: 2012), undoubtedly, goes some way to address the shortcomings of the preceding standard(s). However, in order to bring every worker at height home safely it is critical that manufacturers go one step further and commit to testing on 'as built' structures and validate the engineering performance / parameters of their offer.

This is particularly important in relation to the placement of lifelines, anchors and rails onto modern roofs such as trapezoidal built up, standing seam, composites and non-concrete deck membrane. The relationships between the depth of insulation, height of components, halter clips, fixings, purlin specifications and fall protection anchors are notoriously difficult to predict without test evidence support data.

Standards, almost inevitably, set the minimums required rather than the ultimate desired – worth remembering next time you or your team are attaching a lanyard to anchor adjacent to an exposed drop.



A typical cable system and walkway

#### MCRMA SAFETY LINES GROUP

The MCRMA Safety Lines Group has been formed to address industry concerns that the specific requirements for safe work at height; that is, access, inspection and maintenance, is still not fully understood in certain sectors of the market place. The members of the Group take an active role in the Advisory Committee for Roofsafety (ACR) and support the aim to make working on roofs safer through involvement on the ACR committee and endorsement of the recommendations contained within the Magenta Book.

Members of the Safety Lines Group have more than 35 years of experience in fall protection and provide a wide range of safety solutions. Information about the Safety Lines Group can be found at http://www.mcrma.co.uk/safety-lines.htm

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