



into trees
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11 December 2011

To whom it may concern:

Re: Safe Access in Tree Trimming and Arboriculture, draft Model Work Health and Safety Code of Practice

Further to discussion with SafeWork Australia representatives at the meeting in Mount Waverley on the 30 Nov 2011, I wish to provide the following public comment on the above draft CoP:

The draft CoP in its current form does not accurately represent best practice for climbing in arboriculture. In the (small) section which covers tree climbing, which is by far the most common method of working in trees, many technical mistakes are included in the document, some of which would adversely impact climber safety if followed. In particular, I wish to highlight that tree climbing systems are Work Positioning rather than Fall Arrest (as repeatedly described in the document): this latter is a considerably less safe method of risk control, and could result in regular climber injuries if followed.

I recommend that the text of the *Victorian Tree Industry Organisation Best Practice Guidelines for Tree Climbing*, or the draft *NSW Amenity Tree Industry Code of Practice*, replace the sections on tree climbing in the current draft CoP for Safe Access in Tree Trimming and Arboriculture. A great deal of work has been put into these documents, as well as similar documents specific to the risks encountered in tree climbing, produced in this country and overseas. I strongly recommend that the period for public comment be extended, and that the current draft CoP be extensively re-written in conjunction with industry prior to being re-released for further comment.

I wish however to support the development of a nation-wide CoP to cover tree climbing, and encourage ongoing work on this document to get it to a standard such that it can be endorsed by a wide cross-section of industry. Please contact me if you have any questions, or to discuss these issues further.

Sincerely

A handwritten signature in blue ink, appearing to be 'J Harris', written in a cursive style.

Joseph Harris

**current Australian Tree Climbing Champion (Darwin 2011)
runner-up, International Tree Climbing Championship (2011)**

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