



Health & Safety Standard

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1 Purpose

The Working at Heights standard sets the minimum requirements to manage risk when working at heights.

2 Application

This standard applies to work performed at height on Cenovus sites. Any site level or supplier programs shall meet or exceed the minimum requirements outlined in this document.

3 Requirements

Where the requirements of this standard conflict with site-specific documents, local, federal, or other regulatory bodies, the most stringent shall apply.

Entities shall adhere to the following minimum height requirements for when a fall protection system is required for their site:

- Canada - 3m (10ft)
- US:
 - 1.8 m (6 ft) Temporary Structures
 - 1.2 m (4 ft) Permanent Structures
- Asia Pac – 2m (6.5 ft) China and Indonesia.

Entities shall eliminate the risk of working at heights where practicable or implement alternative methods to reduce the potential of a fall.

In alignment with the Control of Work (CoW) Standard, work at heights shall have an approved and valid safe work permit.

Prior to conducting work at heights, a fall protection plan shall be developed in conjunction with a Field Level Hazard Assessment (FLHA). When conditions change work shall be stopped, hazards re-assessed and mitigated, and all required authorizations are to be revalidated prior to work resuming.

3.1 Fall prevention systems

Fall prevention systems include material and/or equipment (e.g., guardrails, work platforms, scaffolding, etc.) designed for the purpose of preventing a person falling from heights.

- Fall prevention system shall be used in preference to fall protection systems when practicable.
- Fall prevention systems shall be used in accordance with manufacturers and jurisdictional requirements.
- Surface openings at height (e.g., holes in grating, skylights, etc.) shall be barricaded, covered, and/or guarded to prevent access.

3.2 Fall protection systems

A worker shall wear fall protection when they are not protected by a fall prevention system and are exposed to:

- a fall greater than the work sites height requirement
- a fall where the risk of injury is greater than the risk of injury of falling onto a flat surface (e.g., work above rebar)

Fall protection systems shall:

- employ a full body harness and connecting device
- use appropriate anchorage
- be used in accordance with jurisdictional requirements and manufacturers recommendations

Workers utilizing a fall protection system shall:

- be 100% tied off to an approved anchor point while outside a protected area
- not work alone

Body belts are prohibited from use as fall protection.

3.3 Fall protection plans

A fall protection plan shall be developed and made available at the worksite prior to commencing any work at heights as necessary.

The fall protection plan shall:

- be reviewed with all affected workers
- confirm fall distances are sufficient to prevent striking the ground of the object below the work area
- updated when conditions affecting fall protection change
- be approved prior to commencing work at height

The fall protection plan at a minimum shall include:

- fall hazards at the worksite
- fall protection system to be used
- anchorage to be used
- clearance distances below the work area
- equipment inspection

3.4 Inspection and removal from service

Fall prevention and protection systems shall be:

- inspected prior to each use and certified as per jurisdictional requirements
- removed from service if used to stop a fall until recertified by an authorized provider, as per manufacturers specifications
- kept free from any substance or condition that could contribute to the deterioration of the equipment

A device shall be destroyed if the inspection identifies excessive wear/damage or a mechanical malfunction, and the device cannot be recertified.

Anchor points shall be selected, tested, inspected, and approved in accordance with applicable jurisdictional requirements.

3.5 Portable Ladders

Prior to conducting work at heights using a portable, stand-alone ladder, safer alternatives shall be considered.

Portable ladders shall:

- be used in accordance with the manufacturers and jurisdictional requirements on use, storage, and inspection
- have vertical components (rung side supports) made of non-conductive materials when used for electrical work
- be removed from service and be visibly tagged or destroyed if unsafe, defective, or damaged

When working off a portable ladder, workers shall:

- not work from the top two rungs, steps, or cleats of a portable ladder or step ladder unless it is designed by the manufacturer for this application
- secure against movement and placed on a stable base
- ensure the horizontal distance from the base to the vertical plane of support is one-quarter of the working heights
- extend the side rails 1 meter/ 3 feet above the working access area or resting/tie off point
- control the area (flagged or roped off) when other personnel may be exposed to potential hazards from the overhead ladder work

Fall protection as described in jurisdictional requirements shall be worn if working at height on a ladder. Factors where fall protection is not required are:

- the work is short duration and hazard assessed as light duty
- only be allowed for short duration work of 15 minutes or less
- the worker's center of balance is always at the center of the ladder even with an arm extended
- the worker maintains three-point contact when working, climbing, descending, or extending an arm beyond a side rail

3.6 Dropped Objects

Entities shall eliminate the risk of dropped objects where practicable or implement alternative methods to reduce the potential of a dropped object.

- Dropped object hazards shall be identified, and the risk assessed and mitigated.
- Workers shall adhere to identified exclusion zones beneath elevated work areas.
- If required to enter the exclusion zone below an elevated work area, workers shall be protected from falling objects and debris:
 - exclusion zones shall be established to identify areas where there is a risk of being struck by a falling object
- The size of the exclusion shall consider:
 - the potential for deflection of a falling object
 - weight of object
 - direction of fall
 - height of fall
- Tool and hard hat tethers use shall be determined by the site and used in accordance with manufacturers specifications.

3.7 Training

Personnel supervising or performing work at heights shall be trained by a qualified person prior to use. Training at a minimum shall cover:

- legislation
- fall protection plans
- identifying and assessing fall hazards
- fall arrest systems, equipment and inspection
- emergency response
- hands on activities i.e., inspecting, fitting and adjusting

Records shall be kept in accordance with Cenovus' Records and Information Standard.

4 Related information

4.1 References

Table 1: Internal governing references

Document title or link	Relevance
Safe Control of Work Standard	COIMS Standard COIMS-000006

Table 2: External references

Reference Document	Title
Industry Standard / Regulation	CSA (Canadian Standards Association) Standards: <ul style="list-style-type: none"> • Z259.2.1-98 “Fall Arresters, Vertical Lifelines, and Rails” • Z259.2.2-98 “Self-Retracting Devices for Personal Fall Arrest Systems” • Z259.2.3-12 “Descent Control Devices” • Z259.10-12 “Full Body Harnesses” • Z259.11-05 “Shock Absorbers For Personal Fall Arrest Systems” • Z259.12-11 “Connecting Components For Personal Fall Arrest Systems” • Z259.16-04 “Design of Active Fall Protection Systems” • Z259.13-04 “Flexible Horizontal Lifeline Systems”
Industry Standard / Regulation	U.S. Occupational Health and Safety Administration standards, 1915.159, 1915.160, 1910 subpart D, F, I, 1926.501, 550
Industry Standard / Regulation	ANSI (American National Standards Institute) Z359 Fall Arrest Code
Industry Standard / Regulation	ANSI A14.3-2000 Fixed Ladders
Industry Standard/ Best Practice	Energy Safety Canada - Dropped Object Best Practice