

ACEI Covid-19 Advice Note to PSDP and Designers

1. Introduction

This Advice Note has been prepared by the Association of Consulting Engineers of Ireland (ACEI). Its purpose is to highlight some key Covid-19 issues faced by the Project Supervisor Design Process (PSDP) and designers in fulfilling the duties imposed on them by the Safety Health and Welfare at Work (Construction) Regulations 2013. A previous publication, [ACEI Covid-19 Advice Note on Site Inspections](#), will also be of interest to member firms.

This Advice Note is relevant at the point in time at which it is published. Members must bear in mind that Covid-19 issues are evolving very rapidly, and they are advised to keep abreast of the latest advice from the Health Service Executive ([HSE](#)), the Health and Safety Authority ([HSA](#)), the Construction Industry Federation ([CIF](#)) and other relevant bodies.

At all times, member firms should take due account of all HSE and Government advice in relation to Covid-19 restrictions, and seek where appropriate, professional advice in relation to Health and Safety matters. Some useful links and references are provided throughout this note that can be accessed via the relevant images or on the [ACEI Website](#).

2. Covid-19 as a Risk

On 11 June 2020, the European Commission made the decision to classify SARS-CoV-2 as a [risk Group 3 biological agent](#). This has now been adopted and is in force.

Member states must implement the Directive by 24 November 2020. Also, "... the Commission will strongly encourage member states to ensure that written instructions are provided to all workers exposed to Covid-19, as also recommended in the EU guidance on protecting workers."

The following wording is from the [Directive 2000/54/EC](#) on biological agents at work:

Group 1 biological agent means one that is unlikely to cause human disease;

Group 2 biological agent means one that can cause human disease and might be a hazard to workers; it is unlikely to spread to the community; there is usually effective prophylaxis or treatment available;

Group 3 biological agent means one that can cause severe human disease and present a serious hazard to workers; it may present a risk of spreading to the community, but there is usually effective prophylaxis or treatment available;

Group 4 biological agent means one that causes severe human disease and is a serious hazard to workers; it may present a high risk of spreading to the community; there is usually no effective prophylaxis or treatment available.

From Schedule 1 of the Safety Health and Welfare at Work Regulations 2013 - Particular Risk No. 2 is defined as: "Work which puts persons at work at risk from chemical or biological substances constituting a particular danger to the safety and health of such persons or involving a statutory requirement for health monitoring."

Schedule 1 provides a "Non-exhaustive list of Work Involving Particular Risks to the Safety, Health and Welfare of Persons at Work", but particular risks other than those in Schedule 1, if any, must also be considered. These risks are primarily related to, and arising from, the planned construction work activities.

However, the HSA has confirmed that in its opinion, Covid-19 is not a "Particular Risk" for construction projects, and while the coronavirus is a biological substance, it does not arise because of any construction activities, so the risks and controls should be handled separately as a public health issue.

3. Works Which Commenced Before Covid-19 Shutdown

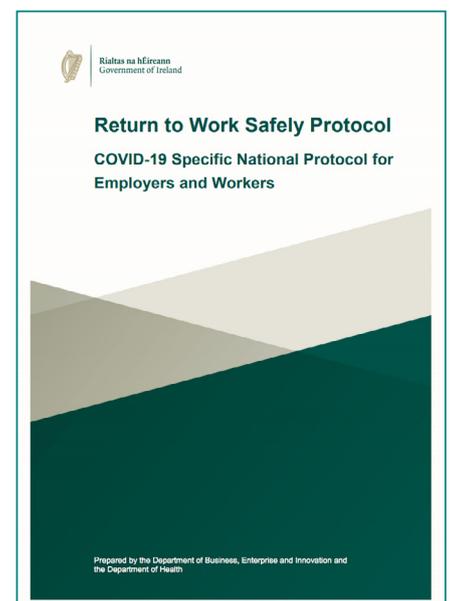
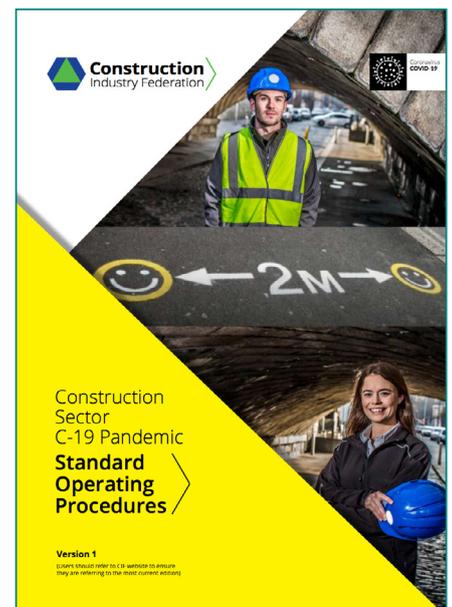
Where the Contractor has been appointed but work has not yet commenced, the Project Supervisor Construction Stage (PSCS) takes the Preliminary Safety and Health Plan and it becomes the live Safety and Health Plan for the duration of the project. Effectively the Preliminary Safety and Health Plan is superseded at this point. It is not advised to re-issue the Preliminary Safety and Health Plan after the appointment of the PSCS.

In other scenarios prior to the appointment of the Contractor, Covid-19 will have to be discussed with the Contractor / PSCS prior to appointment.

In cases when Covid-19 becomes an issue during the construction stage of the project, the PSCS is responsible for making adjustments to the live Safety and Health Plan to reflect the new situation.

It may be prudent for the PSDP on behalf of the client (in order for clients to comply with their duties), to request the PSCS to confirm if adequate controls and procedures have been implemented to appropriately mitigate the risk of transmission of Covid-19.

The *Construction Sector C-19 Pandemic Standard Operating Procedures* developed by the CIF and the *Return to Work Safely Protocol – Covid-19 Specific National Protocol for Employers and Workers* published by the Government of Ireland, provide a good basis on which to consider a PSCS proposal.



4. Works Which Commenced After Covid-19 Shutdown

Evidence would demonstrate that internal works pose a greater risk to construction workers contracting Covid-19, than work carried out externally. Designers and PSDP's therefore should pay particular attention to works carried out internally and consider if any design decisions could be adapted to mitigate risk during construction or maintenance such as:

- Select components which facilitate social distancing
- Identify additional space for site set-up to facilitate social distancing
- Consider modular construction techniques
- Consider how the number of trades on site can be reduced
- Replace in-situ components for prefabricated components
- Consider the maintenance implications of designs

During the current Covid-19 crisis, it is critical that PSDP's and designers do not just concentrate on Covid-19 risks but also consider the risks which traditionally occur on construction sites. It is also important that any measures considered to mitigate the risk of Covid-19 do not introduce other more potentially severe risks.

5. Duration for Completion of Works

The PSDP must include in every Preliminary Safety and Health Plan, the estimated duration for the completion of the works. This estimate must of course consider the impact of Covid-19 on the number of staff that can safely work on a construction site. PSDP's should consider consulting a PSCS / contractor to obtain an opinion on the appropriate duration and, if necessary, advise the client of the necessity of this early engagement.

