



CONSTRUCTION COVID-19 RAPID RESPONSE TASK TEAM

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COGTA

Per email: nervecentre@coqta.gov.za

COMMENT ON THE PROPOSED RISK BASED MODEL FOR ECONOMIC ACTIVITY

1. INTRODUCTION

This comment is submitted on behalf of some 28 organisations forming part of the Construction COVID-19 Rapid Response Task Team (CC19RRTT) representing the Construction Industry in response to Government's invitation for comment on its proposed Draft Framework for Sectors – Risk Adjusted Strategy (RAS). The comment provides motivation for re-activation of 'live' building, civil and electrical engineering projects in the construction sector, that were active on 26 March 2020 under level 4 of the Risk Adjusted Strategy. This includes public works, all other public sector and private projects with support of relevant built environment professionals and the construction value chain. The projects shall be re-activated under the strictest Health & Safety Standards and Protocols and in full compliance with the Construction (Health & Safety) Regulations, guided by industry COVID-19 Health and Safety Guidelines provided by the Department of Employment and Labour.

The comment is made in light of comprehensive Industry COVID-19 Health and Safety Guidelines that the CC19RRTT has prepared and submitted to the Department of Employment and Labour, to ensure that building, civil and electrical engineering projects in the construction sector can be re-activated with minimal risk for workplace transmission of the Coronavirus.

While comments are restricted to Level 4 of the model, reference is made to Levels 3 and 2 where necessary. Provisions of Level 4 make reference to the following sections of our Industry:

- B2 Electricity, Gas and Water Supply;
- C8 Cement, other Construction material, and Hardware, scaling up to 50%
- D1 Civils Engineering for
- D2 Critical Public Works Construction
- D3 Roads and Bridges
- D4 Other Public Works Civil Engineering Projects
- D5 Critical Maintenance and repairs
- L2 Emergency Repair Work, including Plumbers, Electricians, Locksmiths, Glaziers, Roof Repair Work

The comment is also guided by the universally accepted stages of Construction, as codified by GIAMA (Government Immovable Asset Management Act).

Reference to the term ‘construction’ encompasses all forms of construction including building, civil and electrical engineering works unless otherwise stated.

Reference to the term ‘live’ includes building, civil and electrical engineering projects in the construction sector for which site-work had already commenced as at the date of the nation-wide lockdown.

Reference to the term ‘public works’ includes civil engineering and construction projects by the national, provincial or local government constructed for public use or enjoyment.

2. COMMENTS ON THE PROPOSED RISK BASED MODEL FOR ECONOMIC ACTIVITY

(i) Comments related to Section D – Construction and related services

CLAUSE NUMBER	COMMENT
D. Construction and related services (including tradespeople)	<u>Required:</u> Definition of tradespeople and inclusion of manufacturers, suppliers and sub-contractors.
D1. Civil engineering for public works projects (including water, energy, sanitation)	<u>Should read:</u> Construction for critical public works and all other public sector projects (including water, energy, sanitation) <u>Motivation:</u> The building, civil and electrical engineering disciplines are distinct but complementary occupations. The disciplines (including related professional planning and design services) are required on public works projects that are classified as essential at Level 4. It is therefore necessary to appropriately label the section to remove any ambiguity for professionals and contractors in these fields.
D2. Critical public works construction	Proposal to merge Clauses D2, D3 and D4 to provide clarity on the public works projects referred to.
D3. Road and bridge projects	<u>Should read:</u> Construction for all government public works and all other public sector projects (including piling and earthworks) <u>Motivation:</u> a. As indicated above, the civil engineering and building disciplines are distinct but
D4. Other public works civil engineering projects	

	<p>complementary occupations, and both are required on public works projects that are classified as essential at Level 4. It is therefore necessary to appropriately label the section to remove any ambiguity for professionals and contractors in these fields.</p> <p>b. Inclusion of Clauses D3 and D4 at Level 4 is appropriate due to the high cost of standing time and the potential for vandalism of unmanned sites.</p>
<p>D5. Critical maintenance and repairs</p>	<p><u>Should read:</u> Critical maintenance and repairs to buildings and infrastructure.</p> <p><u>Motivation:</u> Critical maintenance and repair work to buildings and infrastructure.</p>
<p><i>Additional Clause</i> D6. All construction projects which had already commenced prior to the lockdown.</p>	<p><u>Motivation:</u></p> <ul style="list-style-type: none"> a. Level 4 should include all existing “live” construction sites which were in process before lockdown irrespective whether it was private or public sector work. b. Strict health and safety protocols on construction sites that include restricted public access, social distancing, and good ventilation provided by open-air working environments allow means that construction is one of the industries that can safely operate while adhering to WHO guidelines on minimising local transmissions. Comprehensive Industry COVID-19 Health and Safety Guidelines have been submitted to the DEL. c. The risk of infection is low on projects that are outside of metropolitan areas and/or where employees can be isolated/accommodated on the site. d. Works programming and sequencing allow site management to control the number of people on site at any given time, as well as the areas where activity is concentrated. e. Consideration is made to the high risk of degradation of completed work through the effects of the elements which could result in demolition, reworking and/or cessation of work on complex civil and construction projects post the lockdown.

	<p>f. Inclusion of live works projects at Level 4 is cognisant of the balance between minimising cases of occupationally acquired infections and the unrecoverable cost of standing time and the potential for vandalism of unmanned sites.</p> <p>g. Inclusion of live works projects at Level 4 is cognisant of the potential for such projects to drive economic recovery and growth through the multiplier effect.</p>
<p>Additional Clause D7. Services required for the measurement, planning, testing and design of infrastructure and development projects.</p>	<p>Motivation: Projects at Levels 3 and 2 require surveying activities to define all the spatial components so that related professionals may plan and design. In order to do so, field information should be gathered in advance of design and construction. If such is not allowed significant economic delays could result at each subsequent level of opening, causing further delays in real estate and new property developments.</p>
<p>Additional Clause D8. All Built Environment and design professionals</p>	<p>Motivation Construction work requires the built Environment professionals and design team to be readily available to operate in compliance with COVID-19 health and safety protocols.</p>

(ii) Comments related to other sections which are related to Construction and related services

CLAUSE NUMBER	COMMENT
<p>C8. Cement, other construction material, and hardware, scaling up in phases to 50% employment</p>	<p>Should read: Cement, concrete (precast and ready mix), other construction materials and hardware including plastic/chemical products, scaling up to 50% employment.</p> <p>Motivation:</p> <ul style="list-style-type: none"> a. Inclusion of cement, other construction materials and hardware including plastic/chemical products is appropriate to prevent shortages of critical materials. b. Distinction of cement and concrete is necessary as they are different products and are equally necessary for any construction project.
<p>Additional Clause D7. Hazardous Materials</p>	<p>Motivation:</p> <ul style="list-style-type: none"> a. The removal and disposal in the Construction industry is subject to strict health & safety controls.

	<p>b. Asbestos work and disposal of same as a hazardous waste product should be included in LEVEL 4 as it would be an ideal time to carry out these works due to reduced risk of exposure to asbestos waste.</p>
<p>Additional clause E2. The sale of hot cooked food, only for home delivery</p>	<p><u>Should read:</u> The sale of hot cooked food, for home and workplace delivery</p>
<p>Additional clause E21. Print shops</p>	<p><u>Motivation:</u> Support services required by businesses in Level 4 includes printing of plans, site signage, site diaries, etc.</p>
<p>H7. Other professional services may operate only where work-from-home is not possible, and only to support other level 4 services.</p>	<p><u>Should read:</u> Other professional and business services may operate only where work-from-home is not possible, and only to support other level 4 services.</p>
<p>Additional Clause H8. Sector bodies such as employer organisations, employee organisations, federations and business chambers</p>	<p><u>Motivation:</u> Necessary to provide industry-related input to the Risk Adjusted Strategy and to provide guidance to constituent members.</p>
<p>Additional Clause J6. Transport and logistics in respect of staff, equipment and material to support Level 4 services.</p>	<p><u>Motivation:</u> Necessary to prevent shortages of critical materials.</p>
<p>L2. Emergency Repair Work, including Plumbers, Electricians, Locksmiths, Glaziers, Roof Repair Work.</p>	<p><u>Should read:</u> Emergency construction repair work such as Plumbing, Electrical, Security, Glazing, Painting, Structural, Roofing, Swimming pools etc.</p> <p><u>Motivation:</u> Damage to fixed property occurs for a variety of reasons and insurance and other related emergency repairs may be required. This includes leaks on pools can be severe and result in big water losses.</p>

3. CONCLUSION

The comment is made in light of comprehensive Industry COVID-19 Health and Safety Guidelines that the CC19RRTT has prepared and submitted to the Department of Employment and Labour, to ensure that building, civil and electrical engineering projects in the construction sector can be re-activated with minimal risk for workplace transmission of the virus.

The Risk Adjusted Strategy should synchronize the opening of the construction industry at one level not in a fragmented fashion, to facilitate a synchronized start up to extract value of an infrastructure-led economic recovery that minimizes risk of transmission

Construction Industry COVID-19 Health and Safety Guidelines as submitted to the DoEL are attached for ease of reference.

Yours sincerely

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Chairperson

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