

June 24, 1996

Ted Palmer  
Protective Roofing Products Ltd.  
10 Pinelands Ave., Unit 5  
Stoney Creek, Ontario  
L8E 3A5

Dear Mr. Palmer:

**SUBJECT: ROOF PERIMETER GUARDING SYSTEMS**  
**OUR REFERENCE NUMBER: 32.68-96274**

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This is in response to your submission of documentation and specifications for four protective devices for perimeter guarding of roofs: the PR20 Eaves Catchguard, the PR2000 Work Platform, the PR100 Edge Protection, and the PR300 Adhesive Guard Rail.

As you know, it is the policy of the WCB not to approve any product or work process, nor is it to allow any product or work process to be advertised as having been approved by the WCB. We review submissions to establish whether a product or work procedure meets the intent of the Industrial Health and Safety Regulations.

Based on the information you provided, I have concluded the perimeter guarding systems meet or exceed the requirements of the Industrial Health and Safety Regulations, subject to the following considerations:

1. Regulation 32.68(3) requires

*"Where a worker is employed on a roof having a slope ratio of 8 vertical to 12 horizontal or greater, the worker must use a personal fall protection system..."*

This means that even if a perimeter guard such as the PR20 or the PR2000 are installed along the eaves, a life line, typically in the form of a fall restraint line with a belt or seat harness, must be used by each worker if the slope of the roof is 8:12 or steeper. The life line is required once the worker is more than 10 ft. away from the eaves protection (measured along the sloped surface of the roof).