employment & labour
Department:
Employment and Labour
REPUBLIC OF SOUTH AFRICA

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Dear Technical Signatory,

RE: INSULATION OF SOLAR PANELS AND "OVER -ROOFING" SHEETS ON ASBESTOS ROOF SHEETS

This correspondence aims to clarify any confusion and non-standardization around the installation of solar panels or "over-roofing" sheets onto existing asbestos roof sheets.

The Department of Employment and Labour (hereafter the Department) is aware of some building owners and clients who wants to install solar panels or "over-roofing" sheets on existing asbestos roof sheets, as type 2 asbestos work.

The Asbestos Abatement Regulations aims to eliminate the risk to health of asbestos in place. To this end, certain activities performed on asbestos in place are prohibited or restricted. Through the requirements of an asbestos management plan, all employers must make provision for a final phase out date as per regulation 6 (2) (c). In addition, certain activities are prohibited in regulation 14.

The drilling into asbestos cement roof sheets at any speed may release fibres and will be increasing the surface area of the asbestos material causing asbestos dust. Replacing screws or even using existing screw-holes will cause risk of abasing the asbestos roof sheets and release fibres during the process of installation and afterwards. Although processes could well be controlled during installation, after installation the client's employees are still left with the asbestos material in place, but now with a greater surface area for asbestos fibre release, possible damage to the sheets that was worked on, and a greater possibility for abrasion of the asbestos materials due to the slightest movement. The asbestos roof sheets will be left in place on the building and eventual abatement of the asbestos will be VERY unlikely. This is against the intention of the Asbestos Abatement Regulations 2020.

Furthermore, with solar panels or "over-roofing" sheets installed over asbestos roof sheets, inspection of the condition and maintenance will be physically restricted, if not totally prevented.

Approved Inspection Authorities are requested to communicate this to potential clients as well as Registered Asbestos Contractors (RACs). Departmental Inspectors have been instructed to not allow asbestos work that entails the instillation of any panels or sheets onto existing asbestos roofs.

Kind regards,

Senior Specialist: OHH

Date: 9/11/2022