

# DOSH DIRECTIVE

Department of Labor and Industries  
Division of Occupational Safety and Health  
*Keeping Washington safe and working*

## 20.75

# Tree and Shrub Trimming, Pruning and Removal

## Updated: February 15, 2019

### I. Purpose

This Directive establishes inspection procedures and enforcement policies related to arborist activities involving tree and shrub trimming, pruning, bracing, removal and surgery.

### II. Scope and Application

This Directive applies to all DOSH operations statewide, and replaces any previous instruction on this issue, whether formal or informal. This Directive has been reviewed for applicability, and remains effective with a new issue date of February 15, 2019.

### III. References

- Chapter 296-54 WAC, Safety Standards for Logging Operations
- Chapter 296-45 WAC, Electrical Workers
- Chapter 296-155 WAC, Safety Standards for Construction Work
- ANSI Z133-2017, Safety Requirements for Arboricultural Operations
- Industry Profile: Landscape and Horticultural Services (OSHA)

### IV. Background

Tree and shrub trimming, pruning, bracing, removal and surgery involve specific risks of injury. Tree felling, working from heights, contact with electrical lines, and injuries from chain saws and other power tools, are but a few of the hazards present in arborist and associated landscape services.

There is no single, specific set of safety and health standards that applies to arborist activities, which has generated questions about applicable regulations. Therefore, this directive was developed to give direction to DOSH staff on how compliance can be achieved and evaluated using existing safety and health standards.

## V. Enforcement Policies

### A. Applicable Standards.

For work involving tree and shrub trimming, pruning, bracing, removal and surgery, certain standards apply depending upon the nature of the underlying activity. For example, Chapter 296-54 WAC addresses logging, Chapter 296-45 WAC addresses work near high voltage lines by qualified workers, and Chapter 296-307 WAC addresses agricultural activity. However, for those employers specializing in this work, whose activities typically do not fall within an industry-specific standard, hazards must be addressed by relying upon the applicable parts of the General Safety and Health Standards (Chapter 296-24 WAC), as well as the Safety and Health Core Rules (Chapter 296-800 WAC). Certain hazards unique to this activity must be addressed using safe place requirements in WAC 296-800-110 (Employer Responsibilities: Safe Workplace).

The applicable industry consensus code, **ANSI Z133-2017**, provides appropriate guidance regarding industry practice and can be relied upon in evaluating a potential “safe place” violation.

### B. Interface with the Logging Standard (Chapter 296-54 WAC).

In cases involving the removal of trees, DOSH will rely upon the underlying purpose to determine whether the logging standard applies. In other words, if the purpose is beautification, and marketing of the logs or log portions is secondary, the logging standard does not apply. Even if the logging standard does apply, guidance related to “piecing out” trees (which is not addressed by the logging standard) would be found in **ANSI Z133-2017** and enforced using the applicable safe place standard.

In cases **not** involving the removal of trees, the logging standard clearly does not apply and the applicable parts of Chapter 296-24 WAC (General Safety and health Standards) and/or Chapter 296-800 WAC (Safety and Health Core rules) will govern the activity, including safe place enforcement based upon ANSI Z133-2017.

### C. Interface with the Construction Standard (Chapter 296-155 WAC).

The construction standard applies whenever the work falls under the scope of the construction standard. This might involve the entire activity (for example, land clearing preparatory to construction activity) or it might involve a portion of the activity (for example, removal of a sidewalk or a bulkhead in order to extract a stump or the root portion of a tree). However, because WAC 296-155-625(1)(a) directs employers to comply with the logging standard during land clearing, “clearing” would be addressed as described in Section B above. Other construction activity would be addressed in accordance with the applicable language in the construction standard.

**D. Interface with the Electrical Workers Standard (Chapter 296-45 WAC).**

Chapter 296-45 WAC, Electrical Workers, would apply only if the definition of a “line clearance tree trimmer” is met. Otherwise, work near high-voltage lines would be addressed through the general electrical requirements or by relying upon the applicable safe place standard and [ANSI Z133-2017](#).

**VI. Technical Support**

Please contact the DOSH Technical Services Logging Specialist, if you have questions about the application of DOSH standards related to logging and arborist activities.

**VII. Review and Cancellation**

This DOSH Directive will be reviewed for applicability two years from the issue date, and will remain effective unless superseded or canceled.

Approved:



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