

# Comparison and gap analysis of the 2012 and 2025 Approved Code of Practice for Forestry.

- [ACOP 341WKS-1-forest-harvesting-safety-and-health-in-forest-ops.pdf](#) (December 2012)
- [WKS-1-safe-practice-forestry-harvesting-operations-acop.pdf](#) (August 2025)

Below is a structured comparison, highlighting key differences, updates, and any notable gaps.

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## 1. Purpose, Scope, and Legal Context

### 2012 ACOP

- Developed under the **Health and Safety in Employment Act 1992**.
- Focuses on practical guidance for employers, contractors, employees, and others in forestry to meet obligations under the 1992 Act and associated regulations.
- Compliance with the code is not mandatory but may be used as evidence of good practice in court.

### 2025 ACOP

- Developed under the **Health and Safety at Work Act 2015 (HSWA)**.
- Explicitly states it **revokes** the previous ACOPs, including the 2012 version.
- Stronger emphasis on the **PCBU (Person Conducting a Business or Undertaking)** concept, overlapping duties, and the contracting chain.
- More explicit about legal requirements, using “must” for mandatory actions under HSWA.

#### **Key Difference:**

The 2025 ACOP is aligned with the newer HSWA 2015, introduces the PCBU framework, and is more explicit about legal obligations and overlapping duties. The 2012 ACOP is based on the older HSE Act and uses more traditional employer/employee language.

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## 2. Structure and Organisation

### 2012 ACOP

- Organised by topic: General Safety, PPE, Tools & Equipment, Wire Rope, Mobile Plant, Fires, Roding, Hazardous Substances, Silviculture, Tree Felling, Breaking Out, Landings, Cable Harvesting, Helicopter Logging, Loading/Unloading, Transport.
- Appendices cover definitions, hazard information, legislative framework, and references.

### 2025 ACOP

- Organised into **Parts**:

- Part A: Managing health and safety through the contracting chain
- Part B: General requirements (worker fitness, workplace, first aid, emergency, PPE, training, drugs/alcohol)
- Part C: Site access and preparation
- Part D: Establishment and silviculture
- Part E: Mobile plant and harvesting
- Part F: Work on landings and loading/unloading
- Extensive use of tables, figures, and practical examples.
- Appendices include a glossary, legal explanations, risk management, standards, and qualifications.

**Key Difference:**

The 2025 ACOP is more modular, easier to navigate, and includes more practical tools (tables, figures, checklists). It is designed for direct use by PCBU's and workers but less so as a book and more as an online resource or in its parts.

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### 3. Risk Management and Hierarchy of Controls

#### 2012 ACOP

- Follows the traditional hierarchy: eliminate, isolate, minimise.
- Focuses on hazard identification, control, and monitoring.
- Emphasises “all practicable steps”.

#### 2025 ACOP

- Stronger, more detailed risk management process, aligned with HSWA.
- Explicit about the **requirement to consult, cooperate, and coordinate** with other PCBU's.
- Provides detailed tables and examples for managing risks (fatigue, mental health, noise, vibration, temperature, UV, hazardous substances, manual tasks).
- PPE is clearly the **last line of defence**.

**Key Difference:**

The 2025 ACOP provides more practical, scenario-based risk management guidance and is more prescriptive about the hierarchy of controls and PCBU duties.

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### 4. Worker Engagement, Participation, and Representation

#### 2012 ACOP

- Covers employee participation and health and safety representatives.

- Less emphasis on engagement processes.

## **2025 ACOP**

- Strong focus on **worker engagement, participation, and representation**.
- Requires PCBUs to engage with workers when identifying hazards, assessing risks, and making decisions about controls.
- Includes detailed guidance on worker engagement, participation, and representation (Appendix 4).

### ***Key Difference:***

The 2025 ACOP mandates and details worker engagement and participation, reflecting HSWA's requirements.

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## **5. Specific Technical Content and Updates**

### **Personal Protective Equipment (PPE)**

- **2012:** Lists required PPE for various tasks, references standards current at the time.
- **2025:** Updates standards, provides detailed tables and figures, and includes industry best practice. Emphasises fit-for-purpose, compatibility, and worker involvement in selection.

### **Mobile Plant and Mechanisation**

- **2012:** Covers mobile plant safety, operator protective structures, and maintenance.
- **2025:** Expands on mechanised harvesting, winch-assisted systems, exclusion zones (e.g., 70m for chain shot), and provides more detailed requirements for plant safety, operator training, and emergency exits.

### **Manual Tree Felling**

- **2012:** Details safe felling practices, escape routes, two tree-length rule, and felling aids.
- **2025:** Adds the five-step tree felling plan, seven key causes of harm, and more detailed requirements for observers, communication, and exclusion zones. Stronger focus on competence and ongoing assessment.

### **Cable Logging**

- **2012:** Covers cable harvesting, rigging, anchors, and safety zones.
- **2025:** Provides more detailed guidance on safe retreat positions, anchor selection, rigging, and documentation. Includes industry best practice and updated standards.

### **Drugs and Alcohol**

- **2012:** Requires a drug and alcohol policy, references the outdated NZFOA Code.
- **2025:** Provides detailed control measures, policy development, and training requirements. Stronger emphasis on support for workers seeking help.

## Emergency Planning and First Aid

- **2012:** Requires emergency procedures and first aid kits, with some detail.
  - **2025:** More comprehensive requirements for emergency plans, first aid facilities, rest areas, and training. Includes checklists and figures for remote work.
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## 6. Gaps and Notable Additions

### Gaps in 2012 ACOP (now addressed in 2025 ACOP)

- **PCBU and overlapping duties:** Not present in 2012, now central in 2025.
- **Mental health, fatigue, and wellbeing:** Minimal in 2012, now detailed in 2025.
- **Mechanised harvesting and winch-assist:** Brief in 2012, now a major focus in 2025.
- **Worker engagement and participation:** Limited in 2012, now a legal requirement in 2025.
- **Industry best practice:** 2025 ACOP explicitly references and incorporates industry best practice, not just minimum legal compliance.
- **Detailed risk management tools:** 2025 ACOP includes practical tables, checklists, and figures for risk management, which are largely absent in 2012.

### Potential Gaps in 2025 ACOP

- **Transition guidance:** The 2025 ACOP revokes the 2012 ACOP but does not provide detailed transition guidance for organisations updating their systems. WorkSafe have indicated that there will be online learning modules launched in the near future along with regional presentations to assist the industry in transitioning to the new code.
  - **Legacy references:** Some references to the 2012 ACOP will remain in both internal and external documents, processes, and standards. These will take time to be updated.
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## 7. Summary Table: Key Differences

Area	2012 ACOP (Old)	2025 ACOP (New)
Legal Framework	HSE Act 1992	HSWA 2015, PCBU, overlapping duties
Structure	Topic-based	Modular, part-based, scenario-driven
Worker Engagement	Limited	Mandatory, detailed
Risk Management	Eliminate, isolate, minimise	Hierarchy of controls, scenario-based, consult/cooperate/coordinate
Mechanisation	Brief	Detailed, winch-assist, exclusion zones

Area	2012 ACOP (Old)	2025 ACOP (New)
Mental Health/Fatigue	Minimal	Detailed, practical controls
PPE	Lists and standards	Updated, fit-for-purpose, worker involvement
Emergency/First Aid	Basic	Comprehensive, checklists, remote work focus
Industry Best Practice	Not explicit	Explicit, referenced
Transition Guidance	N/A	Not detailed

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## Conclusion

The **2025 ACOP** is a comprehensive, update that reflects the New Zealand's health and safety law, industry practice, and the realities of modern forestry operations. It addresses many gaps in the 2012 ACOP, especially around mechanisation, mental health, worker engagement, and risk management and, with its revocation, will create gaps and inconsistencies. Forest Managers and contractors will need to work through the new code and systems and processes to ensure they align with the new code requirements and that any operational gaps are addressed.

## References

[1] [ACOP 341WKS-1-forest-harvesting-safety-and-health-in-forest-ops](#)

[2] [WKS-1-safe-practice-forestry-harvesting-operations-acop](#)