



**Weapons Safety Working Group**  
**BSR E1.78, Prop Weapons Safety**  
**Public Review 1 Comment resolutions**

**Reference document:** BSR E1.78, *Prop Weapons Safety* (Document number WS/2025-30003r0a)

**ANSI Public review period:** Begins on 08 August 2025 and ends on 22 September 2025

**Question:** In your opinion, do you think the requirements of BSR E1.78, *Prop Weapons Safety* (DCN WS/2025-30003r0a) are reasonable, and adequately address the intended subject matter?

Please answer the question using one of the options below. Select “Yes”, “Yes, but...” (provide comments to support your opinion), or “No, with reasons” (the document’s requirements are unacceptable or unreasonable). Note that you are offering your opinion, which is in no way construed as a vote of acceptance or approval.

**Responses:**

Larry Zanoff – IA & Local 44 firearms rep (LZ)	No, with reasons
Kevin Inouye (KI)	Yes, with comments
Dominic Housiaux – Lankey & Limey (DH)	No, with reasons
Chris Moulton – CSATF (CM)	No, with reasons

**Individual Comments:**

No.	Commenter	Ref. section	Comment	Approved resolutions
1	CM	General	<p>This additional proposed standard for the use of Prop Weapons in the motion picture and television industry is not needed. The industry already has multiple industry Safety Bulletins, safety training, State and Federal safety regulations, and other injury and illness prevention plans that provide everything necessary for the safe use of prop weapons on productions. If this standard, as written, becomes an ANSI Standard and is adopted into regulation, the additional requirements beyond existing protocols will be burdensome and not add to safety.</p> <p>Combining firearm type weapons, non-projectile type weapons, and projectile type weapons creates a</p>	<p>Reject. A wide representation of the industry believes that this standard is necessary. Also, it applies to more than just the motion picture and television industry. This standard incorporates many existing protocols and seeks to distill them into an ANSI format.</p> <p>Agree in principle: divided the standard into sub-categories: General, Firearms, Hand Combat, and Projectile type</p>

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			<p>document that is convoluted and not user-friendly.</p> <p>There are terms used in this proposed standard that are not familiar with the motion picture and television industry. The document could be better served by separating out the various prop weapons into separate standards. Removing the motion picture and television industry from the scope, and just focusing on weapons safety for Live Theater and Events would be a better direction for this proposed standard.</p>	<p>prop weapons.</p> <p>Reject. A wide representation of the industry believes that this standard is necessary. There is significant overlap between industry segments and the types of prop weapons used. Having separate standards would involve a lot of duplication and could be more confusing for the users.</p>
2	LZ	General	<p>my comments mainly deal with the Firearms part of the document, as that is my expertise. The majority of the comments have to do with terminology rather than procedure. These comments are my opinions based on 25 years as an armorer in the film industry, as well as consultant in the field of firearms safety/training. the language in quotation marks is taken from industry wide safety bulletin #1, and is the accepted terminology in the industry. Please see below notes on the referenced sections:</p> <p>as a general note, FIREARMS (real firearms that are used to fire blanks) should be called FIREARMS. Attaching the term PROP to them can confuse people, as PROP usually means FALSE/FAKE in some way.</p>	<p>Reject. The existing definitions address this issue. See Definition 2.15</p>
3	DH	All	<p>Replace Person Conducting a Business Undertaking (PCBU). The term PCBU is more commonly used in regulation Australia and New Zealand, but is not in common usage either at the individual, organizational or regulatory level in North America.</p> <p>The use of PCBU may cause confusion for the reader, its also a bit of a mouthful and makes the document harder to read.</p> <p>The document also uses the term controlling party in 3.7 so some consistency of terminology would benefit the reader.</p> <p>Use “Responsible Party” defined as “Any individual or entity that has control over the workplace or business operations”</p>	<p>Accept in principle. Changed to “Controlling Employer” and edited the definition.</p>

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			<p>Alternatively “Controlling Employer” using the OSHA definition</p> <p>In other ESTA standard we are using the term “Project Organizer” which could offer another easily understood alternative to PCBU</p>	
4	DH	All	<p>Recommend adding “. . .and Event Industry” when referencing the Entertainment Industry this is a term we have used in other ESTA standard to illustrate that the standard is broadly applicable to the entire industry regardless of what you call yourself. Example in 3.1 change “There is a great body of knowledge and experience throughout the entertainment and event industry...”</p>	<p>Accept in principle. The existing definition already incorporates this idea.</p>
5	DH	All	<p>Replace the word person or persons with personnel throughout the document. If necessary, define the term in section two to include what is currently in parentheses (e.g. in 3.6) which will eliminate the need for those parentheses.</p> <p>The use of project personnel narrows the scope of who the document is referencing without excluding the different parties discussed in the document</p> <p>Replace person(s) with personnel or project personnel .</p>	<p>Reject. Need more information about the intent of the comment.</p>
6	DH	All	<p>In many instances where the document references person, persons or personnel the reference it really to personnel at potential risk from the hazards created by the use of props weapons. As an example in 3.6 the wording could be simplified if the term personnel was replaced with affected personnel.</p> <p>Replace where necessary person(s) or personnel with “Affected Personnel”</p>	<p>Accept in principle. Document reviewed for adding the word “affected” where appropriate.</p>
7	KI	Various	<p>I feel like 3.12 and 4.3, saying weapons shall be treated as though they were real at all times, are undermined by the very non-real nature of what we do with them usually (pretending to hurt or kill characters), as evidenced by some of the points that immediately follow it, like 3.13 and 3.24. We routinely</p>	<p>Accept in principle. The whole of the section addresses these parameters. Have removed the word “always” and modified some other wording in both sections.</p>

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			have to break one or more of the four cardinal gun safety rules, for example, when asked to put a finger on the trigger, or point a replica at another performer, and I feel that 3.13 and 3.24 do a good job of covering this. 3.12 and 4.3 don't, trying to make an "always" out of something that's bound to fail, setting this up from the get-go as something not to be followed all the time. Perhaps 3.12 and 4.3 can be modified to say something like "As a default behavior, any props should be treated as though they were real and dangerous, until both proven otherwise and given specific instructions on how and why to break those protocols, including what other safety measures are in place to allow that to happen safely."	
8	LZ	1. Forword [sic]	in my opinion it is safer to use the term accident mitigation rather than PREVENTION. even following all the safety guidelines in the world cannot guarantee PREVENTION.	Accept in principle. Adopted "mitigation of risks" and reviewed this language through out the document.
9	LZ	1. Purpose	as above, the term FIREARM, rather than weapon is preferred. As above, i think the word MITIGATE should replace the word PREVENT.	Accept in principle. This standard covers more than just firearms. Changed "prevent" to "mitigate the risk of"
10	LZ	Definitions	2.3 AMMUNITION, MODERN.....the current terminology in the industry is: "AMMUNITION a.k.a. LIVE AMMUNITION: One or more loaded cartridges or shotgun shells consisting of a primer cap, a shell case, a quantity of gunpowder, and a projectile."	Reject. The term "modern" is necessary here to distinguish from "historic" ammunition like black powder used in muzzle loading firearms.
11	LZ	Definitions	2.5 BLANK AMMUNITION.....since the definition of ammunition includes a projectile, the term blank ammunition is at odds with itself. current industry term used is: "BLANK ROUND a.k.a. BLANK: A cartridge consisting of a primer cap, a shell case, and a quantity of gunpowder, but that does not have a projectile."	Accept. Removed the word "Ammunition"
12	CM	Definitions	2.5 Blank Ammunition (Blanks). This definition should be Blank "Rounds" not "ammunition". Blanks are not ammunition.	Accept. Removed the word "Ammunition" (see comment 11)
13	LZ	Definitions <b>2.8</b>	2.7 The word LIVE should be removed as the three items are currently refereed to in the industry as "AMMUNITION" (with projectile), "BLANKS" (without projectile), and "DUMMY INERT ROUNDS a.k.a.	Accept in principle. Added the word "inert" to definition.

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			DUMMY ROUNDS: Inert cartridges consisting of a simulated primer (usually a machined, solid metal disk), a cartridge case, and a projectile."	
14	LZ	Definitions <b>2.7</b>	2.12 PERSON CONDUCTING A BUSINESS.....this is not a term commonly used in the American film industry. PRODUCTION is the entity usually referred to.	Accept in principle. Changed to "Controlling Employer," and edited the definition.
15	CM	Definitions <b>2.7</b>	2.12 Person Conducting a Business or Undertaking (PCBU). This is an unfamiliar term in the US since it is a term used and defined by NSW (Australia) SafeWork agency. OSHA defines and uses the term "Employer" as a person engaged in business affecting commerce who has employees. This would also cover subcontractors since they must follow the direction of the "employer" at a worksite. All uses of PCBU in the document should be changed to "employer".	Accept in principle. Changed to "Controlling Employer," and edited the definition.
16	CM	Definitions <b>2.15</b>	2.14 Prop Weapons. The document uses the term "prop" throughout for both "real" and "fake" weapons. The Industry Wide Labor-Management Safety Bulletin #1 "RECOMMENDATIONS FOR THE USE OF FIREARMS, BLANKS, AND DUMMY ROUNDS" contains this definition: "Prop Firearms: Including but not limited to rubber guns, non-guns, non-functioning replicas, and replicas with recoil simulators". The bulletin uses "firearms" for a real weapons. Suggest developing an acronym for all weapons listed throughout the document and indicate whether it is addressing "real" or "fake" weapons and limit the term "prop" to fake weapons, or real weapons used as props, to avoid confusion	Reject. This definition 2.15 refers to all weapons, not just firearms. The definitions 2.15.1, 2.15.2, and 2.15.3 address the distinctions.
17	LZ	Definitions <b>2.17</b>	2.16 QUALIFIED PROP WEAPONS PERSON....this is known on set as ARMORER, as seen in this definition: "ARMORER: This is the professional, skilled, and properly licensed technician who is hired by the Production, works under the direction and supervision of the Property Master, and maintains control of the firearms on set."	Reject. This standard covers more than just motion pictures. In other areas, other titles are used. This standard seeks to establish requirements for the props weapons person to be qualified for the task, for any segment of the entertainment industry, with which ever title is used,. See Annex 1 for a sample list of job titles from various entertainment segments.
18	CM	3.3	A specific written action plan for every single instance where there may be multiple types of weapons in use on a production will be quite onerous. Suggest,	Accept in principle. Reworded 3.3 and added sub points 3.3.1

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			"Productions shall identify safety risks when using real or fake prop weapons, and establish procedures, resources, and actions to protect against those risks and ensure safety". This would provide equivalent levels of safety and provide flexibility in complying.	and 3.3.2
19		3.3	<p>recommend adding a reference to a risk assessment in 3.3</p> <p>Productions (or projects, or Project Organizer)</p> <p>The Project Organizer shall ensure that a risk assessment is conducted to identify and mitigate the reasonably foreseeable hazards associated with prop weapons used for the project.</p> <p>The project organizer shall ensure that a Prop Weapons Use Action Plan is created to describe and document the policies, procedures necessary to mitigate the hazards identified.</p>	Accept in principle. Reworded 3.3 and added sub points 3.3.1 and 3.3.2
20	LZ	<del>3.5</del> 3.4	affected persons....i suggest PERTENENT PERSONEL might be a better term.	Reject. Per comment #6, have added the word "affected" to personnel references.
21	LZ	<del>3.6</del> 3.5	the safety meeting should communicate: "INTENDED ACTION, POSSIBLE DEVEATIONS, AND PLANS TO ABORT" This includes, but not limited to type of firearm, type of blanks, safe zones, etc.	Accept in principle. Wording modified.
22	DH	3.6 3.4	<p>Recommend re-wording "Safety meetings shall be conducted each day for all personnel (cast, crew and observers) who will be in proximity to the action." To: A prop weapon safety meeting shall be conducted each day for all affected personnel.</p> <p>Or</p> <p>A prop weapon safety meeting shall be conducted each day for all personnel foreseeably exposed to the hazard of the prop weapons at the project site.</p> <p>Another reason for the recommendations is that not all prop weapon safety hazards are as a result of a specific sequence or action and may be more general</p>	Accept in principle. Wording modified

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			in nature.	
23	LZ	<del>A3.7</del> <b>A3.5</b>	Per the wording of 3.7, anyone who needs to use or handle a firearm, should get training. 3.7 includes INSPECTION. Does that mean performers are responsible for inspection of firearms? They are the ones using or handling...? This is recognized as the responsibility of the ARMORER.	Accept in principle. Wording modified and examples are given in annex note A3.5
24	DH	<del>3.9</del> <b>3.7</b>	<p>Replace: Personnel shall follow the instructions given by the Qualified Prop Weapons Person and shall never engage in actions with weapons that are not specifically directed by the Qualified Person.</p> <p>With: Project personnel shall follow the instructions of Qualified Prop Weapons Person and shall never engage in unauthorized access, handling or actions with prop weapons used on the project.</p>	Reject. Existing wording is simpler and adequate
25	DH	<del>3.13 and 3.14</del> <b>3.10</b>	<p>The language is too vague, consulted in this context could mean we asked and then ignored. Recommend the following change:</p> <p>If it is requested that for a choreographed action a prop weapon be directed at or near personnel, the Qualified Prop Weapons Person or other safety representative shall conduct a risk assessment of the specific hazards created and the hazards identified shall be mitigated.</p> <p>The suggested language eliminated the need for 3.14 as that information is contained in the requirement for a risk assessment.</p>	Accept in principle. Reworded 3.10, 3.10.1, and 3.10.2
26	DH	<del>3.20</del> <b>3.17</b>	<p>Recommend language change to help simplify the document</p> <p>Prop weapons shall be inspected and secured by authorized personnel when not being used for rehearsal or performance scenes.</p>	Accept
27	LZ	<del>3.24</del> <b>3.18</b>	this should include language such as: firearms should be cleaned....as required. The current language implies it is to be done only at end of day.	Accept in principle. Partly reworded.
28	KI	<del>3.24</del> <b>3.18</b>	I'd add to 3.21 that another inspection should happen at the beginning of the day as well. No need to blindly	Accept in principle. Partly reworded.

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			trust the last person who packed stuff up!	
29	DH	<del>3.23</del> <b>3.20</b>	Recommend adding reference to the risk assessment  Additional engineering and administrative hazard controls shall be deployed as deemed necessary by the Qualified Prop Weapons Person or as identified in the risk assessment.	Accept in principle. Added wording.
30	DH	<del>3.25</del> <b>3.22</b>	Recommend language change to make the standard more broadly applicable. It also makes it clearer what regulation we are referring to.  The project organizer shall ensure that all applicable national, regional, local and facility specific regulation is followed at all times.	Accept in principle. Partly reworded.
31	DH	<del>3.26</del> <b>3.23</b>	The use of especially feels inappropriate in this context recommend the following change  The Project Organizer shall ensure that all necessary permits, waivers, and insurance riders for using prop weapons. The use of prop weapons visible to the public may include additional permitting, waiver and insurance requirements.	Accept in principle. Partly reworded. Added an annex note A3.23 related to general public.
32	LZ	A4.4 – 4.6	i would replace PREVENT with MITIGATE.	Accept
33	KI	4.4, 4.5 and 4.16 (4.16 is identical to 4.5 and redundant)	[These all] fall under this same general pattern - it can't always be followed, but should be the default. If you say "You must never do this" about something that is routinely done, people will be much more dismissive of this entire project. I've seen people get fired on set because they wouldn't let the director have an actor put a rubber prop gun up against someone's head, despite everyone's consent and the clear fact it was just a piece of rubber.	Accept in principle. Added an annex note to clarify, and striking the word "always" from these points.
34	LZ	4.9 <b>4.10</b>	DUMMY rounds should be added to this sentence.	Accept
35	LZ	<del>A4.11</del> <b>A4.12</b>	i would replace the word DESIGNED with the word INTENDED (firearms manufactures like smith & wesson do not DESIGN their products with the entertainment industry use of blanks in mind). i would	Accept

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			also remove the word JAMS. This is a "catch all" term that is usually used incorrectly. MALFUNCTION is more correct, and should suffice.	
36	CM	4.11 <b>4.12</b>	Change "blank ammunition" to "blanks" or "blank rounds".	Accept
37	DH	4.11 <b>4.12</b>	Recommend adding the word use or replacing the word specify with use  The Qualified Prop Weapons Person shall specify and use the lightest load of blank ammunition possible for the needs of the scene.	Accept
38	DH	4.17 <b>4.18</b>	Recommend that the use of the word authorized gives greater clarity and weight to the requirement  The project organizer shall ensure All affected personnel shall know the authorized target and direction of fire for the scene and only fire as authorized by the qualified weapons person.	Accept in principle. Partly reworded.
39	LZ	4.20 <b>4.21</b>	the word LIVE should be removed. Per the above definition, AMMUNITION already implies that it is "live".  Also, language such as "A CONTROLLED & SUPERVISED ENVIRONMENT, SUCH AS A SHOOTING RANGE" should be added. As it is written now, it sounds like AMMUNITION can be used on a set as long as its a reduced crew. This is incorrect.	Accept in principle. Existing wording is consistent with the revised definitions.  Accept. Reworded. Added 4.21.1 and A4.12.1
40	LZ	4.21.2 <b>4.22</b>	remove the term JAMS	Accept. Also modified 4.22.2
41	DH	4.22 <b>4.23</b>	Recommend the following: Access to all firearm prop weapons' ammunition shall be restricted to authorized users. All authorized users shall be documented and all ammunition for the project shall be clearly labeled and frequently inventoried.	Accept in principle. Reworking the section with subpoints.
42	CM	<del>4.22 and 4.23</del> <b>4.23, 4.24</b>	4.22 through 4.23 uses the term "ammunition" throughout. It is unclear if this is "live" ammunition or "blanks" that are being referenced. If it is not live ammunition then change "ammunition" to "blanks" or	Accept in principle. Reworking the section with subpoints.

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			"blank rounds" or "dummy rounds" where applicable.	
43	LZ	4.24	The indicators of an item being a dummy round should be rewritten as: VISUAL OR AUDIBLE, not AURALLY.	Accept
44	LZ	A4.24	a hole in the side of the case as an indicator of it being a false round, is misleading, as it could still have a functional primer, and still represent a hazard. a false primer, in conjunction with a BB is still the best method for identifying dummy rounds.	Partially Accept. Added some wording to clarify intent. The annex note is not mandatory. Different experts have different preferences for how to meet the requirement in 4.24.
45	CM	5.1	Consider using acronyms for the different types of weapons covered in this document. Suggest adding the list from 2.14.2 as a reminder of what is covered in this section.	Reject. Acronyms are not used in our style guide.  Accept. Added definition language.
46	DH	5.2	Appears to be redundant as the general section applies to the rest of the standard  Delete 5.2	Reject. This is to reinforce that the section 3 general requirements also apply to section 5, Hand Combat weapons. The same statement is made in sections 4 and 6.
47	KI	5.3	I'd say "suitably sturdy" instead of "sturdy", since the category can include things like breakaways.	Reject. The word "sturdy" not found in current document. 5.7 addresses the issue.
48	DH	5.3 5.7	Recommend rewording currently it is unclear if the standard is talking about the demands on the weapon or the person manufacturing them  All prop weapons shall be of sturdy construction and made by qualified craftspeople who understand the specific demands that will be placed upon the weapons they will be constructing.	Accept in principle. Reworded sentence.
49	DH	5.5 5.9	No weapon can be rendered safe only safer. Recommend replacing safe with safer. This then backs up the point made in 5.6. Recommend replacing safe with safer wherever possible throughout the document.	Accept in principle. Reworded sentence.
50	CM	5.7	Change "trained fabricators" to "qualified fabricators".	Accept in principle. Changed to qualified craftspeople.
51	CM	5.8, 5.8.1,	Change "live" to "real". Live is a term the motion	

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		and <del>5.8.2</del> <b>5.12</b>	picture and television industry use when referring to ammunition.	Accept in principle. Adding a definition for "live prop"
52	DH	<del>5.8</del> <b>5.12</b>	<p>Recommend use of the word authorized. Recommend the following from the Fire Safety Standard.</p> <p>The project organizer shall ensure that "Live" (sharp or pointed) prop weapons are not authorized in the rehearsal or performance space.</p>	Accept in principle. Added the word authorized.
53	KI	<del>5.8 and 5.8.1-5.8.3</del> <b>5.12</b>	<p>that's another instance where you say "thou shalt not" and then immediately offer an exception. Maybe let them be a part of the same 5.8, so we don't have something out there that's a "shall" item that we all acknowledge sometimes has to be broken. Don't make a rule you know will be broken, if you want people to respect the rules.</p> <p>There's a little format proofreading that should be done as a final pass - things like inconsistency in number of hard returns between paragraphs, or extra spaces in the middle of a sentence.</p>	<p>Accept in principle. Reworded 5.12 and 5.12.1</p> <p>Accept. Proofreading is ongoing.</p>
54	DH	<del>5.8.2</del> <b>5.12.2, 5.12.3, 5.12.4</b>	<p>While many people may be part of the discussion in determining if a live weapon has no alternative. The standard should identify who is ultimately responsible and extra mitigations must be put in place to maintain the same level of protection that would be achieved by using a weapon that as not live. Recommend the following changes</p> <p>All creative decision makers, including but not limited to the Director, Producer, Property Master, Fight Choreographer, Qualified Prop Weapons Person, Stunt Coordinator, and Special Effects Technician, shall jointly determine whether there is a practicable alternative to using a "live" weapon.</p> <p>The project organizer must ensure that any additional hazards caused using a live weapon are mitigated.</p> <p>The Performer must be a part of the discussion and voluntarily agree to the use of a "live" weapon without</p>	Accept. 5.12.2 reworded to identify the qualified prop person as leading the decisions.

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			coercion or threat of sanction.	
55	CM	<del>5.8.3</del> <b>5.12.5</b>	Change "live tools" to "functional tools".	Accept
56	DH	<del>5.10</del> <b>5.14</b>	Recommend replacing the word addressed with mitigated	Accept
57	CM	<del>A5.11</del> <b>A5.16</b>	Add "visually" before the work "inspect" in the first sentence. The performer may not know how to inspect the weapon's structural integrity.	Accept. Added word to A5.16
58	CM	<del>5.12</del> <b>5.15</b>	Move section 5.12 before section 5.11 and renumber. It makes more sense for persons to receive instruction before inspecting a weapon.	Accept in principle. Reworked
59	DH	<del>5.12</del> <b>5.15</b>	Recommend the following changes to improve clarity, consistency, and readability.  The project organizer shall ensure that performers receive training in identifying applicable hazards that may occur during use of the weapon(s) they are authorized to operate.	Accept in principle. Reworded 5.15
60	DH	<del>5.15</del> <b>5.19</b>	The word appropriate is subjective recommend rewording to:  The project organizer shall ensure that protective equipment (which may include padding, braces, wraps and other equipment) required to protect the performer from reasonably foreseeable injury hazards are provided to the performer at no cost to the performer.	Accept in principle. Reworded 5.19.
61	CM	<del>A5.15</del> <b>A5.19</b>	Not sure if the mention of long-term ergonomic injury should be part of this standard. Suggest deleting first sentence of this section.	Reject. This is a non-mandatory informational annex note.
62	DH	<del>5.16-5.17</del> <b>3.34, 3.34.1, 3.34.2</b>	If harmful levels of sound are reasonably foreseeable the Health and Safety regulation (e.g. OSHA, Work Safe etc.), the employer already has a legal duty to establish a "written hearing conservation program". The regulation in part requires that the employer measure and monitor noise levels and provide hearing protection and training in the effective use of the protection.	Accept in principle, partially reworded 5.16, 5.17 Also, moved to Section 3, General

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			<p>Under the regulation if there is a hazard to hearing, hearing protection is not optional unless the hazard can be mitigated in another way to reduce the noise hazard below harmful levels (85db) and OSHA mandates hearing protection above 90db of exposure.</p> <p>5.16 and 5.17 are in conflict with existing regulation. Recommend the following wording with the two entries combined.</p> <p>“5.16 The project organizer shall ensure that affected project personnel are protected from reasonably foreseeable hazards to their hearing that result from prop weapon usage, (e.g., a shield being struck by a weapon).</p> <p>The project organizer shall ensure compliance with all applicable regulation for noise exposures above 85db.</p> <p>Compliance includes but is not limited to instituting a written hearing conservation program, measuring sound exposure levels, providing training and requiring hearing protection.</p>	
63	CM	<del>5.17</del> <b>3.37</b>	Replace language with "A qualified person may determine that hearing protection is required".	Reject. The controlling employer carries the responsibility. Also, moved to Section 3, General
64	DH	<del>5.18</del> <b>3.34</b>	<p>Recommend the following language to harmonize this section with earlier comments in section 3</p> <p>The project organizer shall ensure that the hazards from potential allergens (e.g., latex, copper) used in the construction of prop weapons are included, evaluated and mitigated using a risk assessment.</p> <p>The risk assessment shall include the identification of the affected project personnel who are at risk of an allergic reaction. Qualified personnel shall be authorized to work with affected project personnel to determine the best way to protect them from the hazards identified.</p>	Accept in principle. Reworded 3.38, added 3.38.1 and 3.38.2 Also, moved to Section 3, General
65	CM	<del>5.19</del> <b>3.25</b>	Change "first aid officer" to "first aid provider". We don't use the term "officer" for this occupation.	Accept in principle. Reworded and expanded with 3.26, 3.26.1, and 3.26.2.

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				Also, moved to Section 3, General.
66	DH	<del>5.19</del> <b>3.25</b>	<p>This requirement should be moved to section 3 as it should apply to all types of prop weapons. Recommend the following change to the language.</p> <p>The project organizer shall ensure that first aid equipment and first aid trained personnel are provided at the project site. The provision of first aid shall mitigate reasonably foreseeable illness and injury hazards for the prop weapons being used. Any evaluation and mitigation of these hazards must include the risks due to delays of access to medical care beyond first aid.</p> <p>The project organizer shall ensure that information for the location of medical services and methods of summoning EMS are provided to all affected project personnel.</p>	<p>Accept in principle. Reworded 3.25 and expanded with 3.26, 3.26.1, and 3.26.2.</p> <p>Also, moved to Section 3, General.</p>
67	LZ	<del>5.19-5.20</del> <b>3.25 – 3.26</b>	<p>mention of medical facilities and care should appear when talking about the use of firearms and blanks as well, usually during the safety meeting.</p>	<p>Accept in principle. Reworded 3.285 and expanded with 3.26, 3.26.1, and 3.26.2.</p> <p>Also, moved to Section 3, General</p>
68	DH	<del>5.20</del> <b>3.29</b>	<p>Recommend that this already covered in the language provided in comment 25 and should be deleted.</p>	<p>Accept in principle. 3.29 reworded</p> <p>Also, moved to Section 3, General</p>
69	CM	<del>5.20</del> <b>3.26.2</b>	<p>Change "ambulance being present" to "ambulance may be needed". Makes more sense.</p>	<p>Accept in principle. Wording changed per comments 66 &amp; 68</p> <p>Also, moved to Section 3, General</p>
70	DH	<del>5.21</del> <b>3.30</b>	<p>Move to section 3 this applies to all prop weapons</p> <p>General note the term prop weapons is used throughout this section if the requirement are specific to Non Projectile weapons recommend that the letters NP be added before all references to prop weapons in section 5</p> <p>Change to "NP prop weapons"</p>	<p>Accept move to Section 3</p> <p>Reject wording change. The move to section 3 covers all prop weapons. We also want to avoid using abbreviations or acronyms.</p>
71	CM	<del>5.22</del> <b>3.28 – 3.29</b>	<p>Change section to read, "The Qualified Person must keep track of all prop weapons and all individuals</p>	<p>Moved to section 3</p>

No.	Commenter	Ref. section	Comment	Approved resolutions
			(performers and crew) who handle these prop weapons." Tracking every single movement of every weapon and every performer may be impossible to accomplish.	Accept in principle. Some rewording.
72	CM	<del>5-23</del> <b>3.29</b>	Change section to read, "The Qualified Person and should be aware of the intended use of all prop weapons and should observe their use by the Performers or Fight Choreographers that are actively rehearsing or performing with them." This makes more sense than "managing" the weapon.	Accept in principle. Moved to section 3 and some rewording.
73	DH	<del>5-23</del>	Remove space between "the" and "performers"  Recommend moving to section three and checking the document for duplication.	Accept. Moved to section 3.
74	DH	<del>5-24</del> <b>3.30</b>	Move to section three. In addition, recommend the following changes for clarity [and]  Delete sub points of 4.24 as the language suggested combines them.  The project organizer shall ensure all prop weapons are secured in a locked cabinet, container or room not in use to prevent unauthorized access.	Accept in principle. Moved to section 3 and some rewording. Added sub-points 3.30.1, 3.30.2, 3.30.3, and 3.30.4
75	CM	<del>5-24.2</del> <b>3.30.2</b>	Change section to read, "Secure means that the room or container is accessible only by a select few individuals." Delete "in case of a container, it cannot be moved." The armorer can move firearms on trucks or lock boxes, and the weapons are still secure.	Accept in principle. Moved to section 3 and some rewording. Added sub-points 3.30.1, 3.30.3, and 3.30.4
76	LZ	<del>5-25</del> <b>3.31</b>	props not leaving the set..... This should appear in the section about firearms as well.	Accept. Moved to Section 3.
77	DH	<del>5.25 and 5.26</del> <b>3.34, 3.35</b>	Move to section 3	Accept. Moved to section 3 and renumbered.
78	CM	<del>5-26</del> <b>3.32, A3.32</b>	Change section to read, "Real or Fake prop weapons should be stored in clearly labeled containers. Removable tags may be used to identify specific	Moved to section 3 Reject. Current wording expresses the intent. A3.32 adds

No.	Commenter	Ref. section	Comment	Approved resolutions
			weapons for specific use." Delete section A5.26 because it is not necessary with the revision to 5.26.	informational non mandatory options.
79	DH	<del>5.27</del> <b>3.3</b>	<p>Recommend the following changes for clarity. If NP is removed from this proposed language (parentheses for emphasis) this would be broadly applicable and could be moved to section 3.</p> <p>The project organizer shall ensure that included in the Prop Weapons Action Plan are procedures for responding to the hazard created due to failure or damage to a (NP) prop weapon during it's use. Additional mitigations may be required for mitigating these hazards that occur during a live performance.</p>	Accept in principle. Moved to section 3 and some rewording. Added sub-points 3.3.1 and 3.3.2.
80	CM	<del>A5.27</del> <b>A3.34.1</b>	This should be deleted since it seems to not have anything to do with safety.	Moved to section 3 Reject deletion. The annex note is a non-mandatory example.
81	CM	6.1	This section seems convoluted and difficult to understand what is being said. Consider deleting this section and moving section 6.4 to the beginning of section 6.	Accept in principle, 6.1 rewritten and 6.4 moved to 6.1.1
82	DH	6.1	<p>"...By definition, Firearms Type Prop..."</p> <p>Recommend the following language change</p> <p>"... As defined in this standard, Firearm Type Prop..."</p>	Accept in principle. Reworded section
83	DH	6.2	Is redundant as section 3 are general requirements and apply to the whole standard recommend deleting 6.2	Reject. 6.2 emphasizes that Section 6 does not stand alone. There is a parallel statement in sections 4 and 5.
84	DH	6.3	<p>Recommend the following language change for clarity and consistency with previous comments submitted on this form.</p> <p>The project organizer shall ensure that projectile type prop weapons are under the supervision of an authorized qualified props weapon personnel.</p>	Accept in principle. Reworded to "controlling employer"
85	DH	<del>6.5</del> <b>6.8</b>	<p>Care appears to be a subjective term and difficult to define. Recommend the following alternative language</p> <p>The project organizer shall ensure that affected project personnel are trained to identify and mitigate potential hazards whenever props or parts of props are thrown,</p>	Accept in principle. Reworded section.

No.	Commenter	Ref. section	Comment	Approved resolutions
			fired, shot, launched, propelled or otherwise projected into the air.	
86	DH	<del>A6.5</del> <b>A6.7</b>	Projectile Type Prop Weapons are capable of causing serious injury or death.	Accept
87	CM	<del>6.6</del> <b>6.9.1</b>	Pellet guns, air-soft, and paint ball should be added to the list in 6.4 so that 6.4 is a complete list of prop weapons covered in section 6.	Reject. The lists given in 6.1.1 and 6.9.1 are illustrative, not all inclusive.
88	CM	<del>6.7</del> <b>6.9, 6.9.1</b>	Change section to read, "All Projectile Type Weapons shall be treated in a safe manner." Treating all prop weapons as if they are real can be a problem. There may be things you want to do with fake weapons, such as a rubber axe, that you couldn't do with a real one.	Accept in principle. Some rewording. We want to encourage a culture of safety at all times as noted in A6.9.
89	KI	<del>6.7</del> <b>6.9</b>	I'd echo what I said wit 3.12 and 4.3 and 5.8  For Appendix 3, the commerce dept. rules on marking replicas might also apply: 15 U.S. Code § 5001 - Penalties for entering into commerce of imitation firearms	Accept in principle. Reworded to match other references.  Accept in principle. Added reference to Appendix 3.
90	DH	<del>6.8, 6.9, 6.10, 6.13, 6.15, 6.21, 6.22</del>	Recommend the addition of the following language at the start of each sentence  The project organizer shall ensure...	Accept in principle. Language changed to "controlling employer" throughout the draft.
91	CM	<del>6.5, 6.8, and 6.9</del>	all say essentially the same thing. Consider combining them into one thought.	Reject. This content follows the same pattern as other sections.
92	CM	<del>6.10</del> <b>6.14</b>	This section should be moved closer to the beginning of section 6 or add to section 6.4 (which it was suggested earlier to change 6.4 to 6.1.	Accept in principle. Content reordered.
93	CM	<del>6.11</del> <b>6.5</b>	Consider moving this section to be right after 6.3 since 6.3 talks about the supervision by a qualified prop weapons person.	Accept in principle. Content reordered.
94	CM	<del>6.13</del> <b>6.18</b>	Change section to the language of 5.11 and A5.11 and make it a visual inspection. The way it is currently written could infer a written inspection of the prop before and after every sequence is required. There could be multiple sequences in every scene and this	Accept in principle. Some rewording.

No.	Commenter	Ref. section	Comment	Approved resolutions
			would lead to hundreds of inspections per scene. Inspections could also be different for fake vs real prop weapons.	
95	CM	<del>6.14</del> <b>6.16</b>	Change "what projectiles can be used" to "what projectiles will be used".	Accept in principle. Some rewording.
96	DH	<del>6.14</del> <b>6.16</b>	Recommend the addition of the following language  The project organizer shall authorize the Qualified Prop Weapons Person to specify what projectiles can be used.	Reject. The qualified person has already been authorized by the controlling employer.
97	CM	6.15	Change "personnel" to "persons" to be consistent in the document.	Accept in principle. A final editorial review will work on consistency in language throughout the draft.
98	CM	<del>6.17</del> <b>6.13</b>	Change section to read, "All affected personnel shall know the intended target and path of travel for the projectile. The launching or firing of the projectile shall only be done in the prescribed (rehearsed) manner." The term "All personnel) is too encompassing. Persons working outside of the action area would generally not need to know.	Reject. Persons working outside the area can be deemed not affected.
99	DH	<del>6.17</del> <b>6.13</b>	Recommend the addition of the following language  The project organizer shall ensure All affected personnel shall know the authorized target and direction of fire for the scene and only fire as authorized by the qualified weapons person.	Reject. The Qualified person has already been authorized by the Controlling Employer.
100	DH	<del>6.18</del> <b>6.21</b>	Recommend the addition of the following language to use more generally applicable terminology  The Projectile Type Prop Weapons shall be handed off to the authorized prop weapons handler at the end of the sequence, action or use.	Accept in principle. Some rewording.
101	CM	<del>6.19</del> <b>6.22</b>	Change section to read, "All relevant Projectile type prop weapons shall be unloaded and the stored energy released at the end of the sequence by a qualified person." Releasing all stored energy is not always possible so it should be relevant props and at the instruction of a qualified person.	Reject. Stored energy can be safely released by a qualified person.

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102	LZ	<del>6.20</del> <b>6.23</b>	remove the term JAMMING.	Accept
103	CM	<del>6.24</del> <b>6.8</b>	Change "safety training" to "safety meeting". A safety meeting would be more current with the day's activities.	Reject. Safety training and safety meetings are addressed in Section 3, General. 6.8 is specific to training on the particular props being used.
104	LZ	<del>6.22</del> <b>6.23</b>	Remove the term JAMS.	Accept
105	DH	<del>6.24</del> <b>6.26</b>	<p>Recommend the addition of the following language to use more generally applicable terminology</p> <p>The project organizer shall ensure all personnel present are notified prior to firing projectile type prop weapon and are provided with Personal Protective Equipment (PPE) necessary to mitigate their exposure to the reasonably foreseeable hazards that may result from the firing of the weapon(s).</p>	Reject. Extra wording unnecessary.
106	CM	Appendix 1	<p>The specific job titles should be listed as they relate to those in the motion picture and television industry and those in live theater and events. A hierarchy would be nice also. Many job titles are defined by Collective Bargaining Agreements and may not match certain ones listed.</p> <p>Suggest using definition of "Fight Director" from the SAFD instead of what the name implies. "A Fight Director is a Certified Teacher with significant professional fight direction / fight choreography credits. This individual is endorsed by the Society to direct and choreograph incidents of physical violence. A candidate for the status of Fight Director must fulfill the requirements of Fight Director status as prescribed in the Policies and Procedures of the SAFD."</p>	Accept in principle. The Appendix is solely informative and does not contain any requirements. Added language to clarify intent.
107	CM	Appendix 2	Change in the first paragraph "providing additional safety perspectives" to "providing alternative safety perspectives". Also delete "It is notable that all say essentially the same things." There are differences between these documents as they relate to the	Accept in principle. Added some language and have edited to remove editorial comments.

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			<p data-bbox="537 139 1171 172">motion picture and television industry and live theater.</p> <p data-bbox="537 204 1140 289">If all of the documents listed in this appendix were used as reference, there should be footnotes in this standard indicating so.</p>	
108	CM	Appendix 3	Probably should add the California Firearms Safety Certificate to this appendix, and any other relevant California regulations.	Accept. Reference to California Penal Code section 31615 added to list.