



Event Safety Working Group

ES1.2 - 202x, Event Safety - Planning, Management, & Major Incident Public Review 2 Comment Resolutions

Reference document: ES1.2 - 202x, *Event Safety - Planning, Management, & Major Incident* (Document number ES/2019-20011r2)

ANSI Public review period: 11 August 2023 through 25 September 2023

Question: In your opinion, do you think the requirements of ES1.2 - 202x, *Event Safety - Planning, Management, & Major Incident* (DCN ES/2019-20011r2) 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).

Responses:

Dominic Housiaux, Lankey & Limey Ltd. (DH)	DH	Yes, but...
*Steve Lemon, Production Manager, ESA Founding Board Member	SL	N/A
*Steve Adelman, Adelman Law Group	SA	N/A
*Janine Jordan, GREEN WAVE enterprises	JJ	N/A
*Event Planning, Management and Major Incident task group	TG	N/A

*These comments were informally submitted, directly to or by the task group, after the review period closed.

Individual comments and resolutions:

No.	Commenter	Ref. section	Comment	Commenter’s proposed change	Resolution
1	DH	Introduction	The event safety management planning team must include stakeholders who participate in the management of day-to-day safety practices and/or play a role in the crisis response plan and producing a safe event.	Propose removing “or” from and or per ANSI & ETCP guidelines	Accept
2	DH	Introduction	These stakeholders are an integral component part of producing a safe event and should be included in the planning considerations	Propose replacing “considerations” with process to improve clarity.	Accept

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3	DH	Introduction	The goal of this standard is to identify and describe the steps necessary to create a reasonable level of safety throughout all phases of the event including planning for and responding to emergencies. This includes identifying the roles and responsibilities of the event organizer and the applicable event personnel.	Propose removal of the word "the" for clarity and readability	Accept
4	DH	Purpose	The purpose of this standard is to identify and describe the steps necessary to create a reasonable level of safety throughout all phases of an event.	Propose adding language to clarify the purpose of this standard as currently it is too broad and does not reference the topics highlighted in the standards title. "The purpose of this standard is to identify and describe the steps necessary to create a reasonable level of safety throughout all phases of an event. Through the use of effective safety planning, management and incident response"	Accept
5	DH	Application	This document is part of a collection of standards relating to event safety. Users should consider the requirements of the complete collection in relation to the application of this standard, where such consideration is necessary to coordinate and correlate related requirements into an event safety management plan.	Propose removing the words "and correlate" and replacing it with "and implement". This seems to be closer to the intent of the sentence and correlate seems to be a less effective word choice in this case.	Accept in principle. Replaced "correlate" with "incorporate."
6	DH	Definitions 2.12	The use of event phases, whilst intended to improve clarity around what the authors mean and what is included when talking about different aspects of the event, ultimately feels less successful. The concept of a phase is so fluid in realizing an event (and there is often significant overlap that its use unfortunately does not achieve the hoped for clarity. This I think is demonstrated by the length of the definitions themselves	Propose, removing these definitions and instead using the terms, "planning" "assembly" (or installation) or "set up" "operation(s)" "disassembly" "removal" and "return." Which if they require any definition beyond the dictionary definition would allow for simpler clearer definitions and better clarity of the authors intent in the body of the document.	Reject. The TG believes the existing terminology/definitions are important and needed to more specifically delineate one phase from another. In developing a standard, it is important to establish precise meanings for words and phrases that have previously been used and misused but not well defined.

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7	DH	3.1	3.1 Every event must comply with all local, regional and national laws and regulations as per the authority having jurisdiction (AHJ).	Propose the removal of the "AHJ" reference as if the event was complying with all local, regional, national laws and regulation they would be, by definition, be following any statutory AHJ. In places in the world where there is no enforcement by an applicable "statutory" AHJ the AHJ would be the event organizer or venue etc., so 3.1 already tells them to follow the regulation.	Accept
8	DH	3.4	<ul style="list-style-type: none"> Roles, titles 	Propose removal of the word title as a title would be an intrinsic part of the process of assigning roles and responsibilities	Accept
9	DH	3.5	<p>All event stakeholders (e.g., first responders, AHJs, etc.) must be informed of important event safety and security features including, but not limited to, ingress, egress, and other emergency information during the event safety meeting.</p> <p>This information should be updated regularly by the health and safety coordinator by any means necessary as the set-up progresses and risks, hazards and locations change.</p>	<p>Propose removal of text struck thru and adding in its place "...and communicated to event stakeholders as.."</p> <p>This would improve the clarity of the intent of 3.5 and make it sound less like a Tom Clancy novel 😊</p>	Accept
9	DH	4	Event phase 1: Planning the event	Propose: Changing to: "Planning the event"	<p>Accept in principle.</p> <p>Include "Event phase 1" parenthetically.</p>

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10	DH	4.1.1	<p>The event organizer shall initiate the planning of the event and shall be responsible for all health and safety related issues during all phases of the event.</p> <p>This requirement is unenforceable and does not match the clarity of language that already exists in applicable regulation</p>	<p>Propose: The event organizer shall initiate the planning of the event and shall be responsible for ensuring the health and safety of all event personnel and attendees.</p> <p>The use of the word ensure follows language that already exists regulatory language and ANSI standards eg "ANSI Z 10 Definition Occupational health and safety management systems"</p> <p>"Ensure: To make every reasonable effort to fulfill your responsibilities"</p>	Accept
11	DH	4.1.1.1	<p>"The overall responsibility for health and safety-related issues must not be delegated away from the event organizer, but the tasks associated with this responsibility may be delegated to others."</p> <p>Delegated is not the appropriate word in this context as we can "delegate" someone else to do something for us but that does not mean we have "transferred" the responsibility</p> <p>This statement there for contradicts other OSH regulation. The responsibility for ensuring health and safety can never be fully transferred to another even by contract but, it can be reduced depending on the circumstances. However the duty to ensure is never transferred if you are the "Controlling Employer". How you ensure depends. If I hire a pyrotechnic company as an event organizer my responsibility is to ensure that I hire someone licensed and reputable with a good safety plan and to make sure they follow their plan. It is not my responsibility to tell them how to handle the explosives as I am not qualified to do so and could create additional hazards and liability by doing so.,</p>	<p>Propose: "Tasks necessary for creating and maintaining health and safety at the event may be delegated to others once the event organizer has ensured that they are competent or qualified to effectively carry out the assigned tasks."</p>	Accept

No.	Commenter	Ref. section	Comment	Commenter's proposed change	Resolution
12	DH	4.1.1.2	Remove 4.1.1.2 if accepting proposal for 4.1.1.1 in comment 10		Accept
13	DH	4.1.3	There is an extraneous "and" at the end of the third bullet point	Propose removing the "and"	Accept
14	DH	4.1.4	The event organizer should obtain health and safety, legal, and insurance advice from qualified persons early in event phase 1- (planning phase) The sentence is difficult to read	Propose "The event organizer should obtain health and safety, legal, and insurance advice from qualified persons early in event planning process."	Accept in principle. "Event phase 1" was included parenthetically.
15	DH	4.2.13	See previous comment on the event phases.	Propose When planning the event, the event organizer must seek advice from the health and safety coordinator regarding all contracts and agreements between the event organizer and their contractors to ensure the contracts and agreements adequately address issues related to health and safety at the specific event	Reject This is an intended use of this term ("event phase 1").
16	DH	4.2.13.3	Relevant insurance schedules should be provided by all contractors for review by the event organizer and health and safety coordinator to ensure correctness, adequate coverage levels, and to determine if advice from a broker is required. Recommend some minor changes for clarity and readability.	Propose: Relevant insurance schedules should be provided by all contractors for review by the event organizer and health and safety coordinator to ensure applicable details are correct, and that there are adequate coverage levels.	Accept in principle. 4.2.13.3 has been revised to address this proposal, related proposals, and additional concerns of the task group.
17	DH	4.3.1	The event organizer must hold at least one planning meeting prior to the start of event phase 2 to review risk assessment and draft event safety management plan (ESMP), and to revise them, if necessary, based on changes made during the time frame between event phase 1 and phase 2 See previous comments on phases	Propose: The event organizer must hold at least one planning meeting prior to the installation of the event to review the risk assessment and draft event safety management plan (ESMP), and to revise them, if necessary, based on changes made during the planning of the event.	Accept in part. This is an appropriate use of "event phase 2," but the suggested change at the end of the sentence is acceptable.

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18	DH	4.3.3	<p>During event phase 1, the health and safety coordinator should plan for the communications of site safety rules, which should include briefings that will be held prior to event personnel entering the site.</p> <p>See previous comments on phases</p>	<p>Propose: During the planning of the event, the health and safety coordinator should create plans for the effective communication of the site safety rules. This should include briefings that will be held prior to event personnel entering the site.</p>	<p>Accept in principle.</p> <p>Accepted with slight modification of the language proposed and parenthetical inclusion of "event phase 1."</p> <p>See also comment #51.</p>
19	DH	4.3.8.1	<p>The specific ways in which this coordination occurs, and the specific roles and responsibilities associated with it, should be identified and planned in event phase 1 and included in the ESMP.</p> <p>See previous comments on phases</p>	<p>Propose: When planning the event the specific timing and methods of communication, and the specific roles and responsibilities associated with them, should be identified and included in the ESMP.</p>	<p>Reject</p> <p>This proposal does not include when this coordination should be done and appears to alter the meaning of the paragraph.</p>
20	DH	4.4.4	<p>The event organizer must take into consideration the surrounding areas when selecting an event site. This may include but is not limited to obtaining permission, whether by law or consideration, regarding surrounding wildlife, and from neighboring facilities and residences to produce the event.</p> <p>The word consideration is too difficult to enforce recommend some alternative language and the intent is not clear.</p>	<p>Propose: The event organizer must evaluate the potential impact of the event on the surrounding areas when selecting an event site. This may include but is not limited to obtaining permission, whether by law or consideration, regarding surrounding wildlife, and from neighboring facilities and residences to produce the event</p>	<p>Accept</p>
21	DH	4.5.7	<p>If the event is to be held in an existing venue, such as an auditorium, rental outdoor event space, arena or sports stadium, the health and safety coordinator must communicate with the venue management regarding any existing health and safety policy and procedures</p> <p>Suggest language changes to improve clarity of intent</p>	<p>Propose:</p> <p>If the event is to be held in an existing venue, such as an auditorium, rental outdoor event space, arena or sports stadium, the health and safety coordinator must communicate with the venue management to secure copies of any existing health and safety policy and procedures.</p>	<p>Accept</p> <p>See also comment #57.</p>
22	DH	4.5.10	<p>The ESMP, once compiled, should be shared with local authorities and responder organizations prior to event phase 2.</p> <p>See previous comments on phases</p>	<p>Propose:</p> <p>The ESMP, once compiled, should be shared with local authorities and responder organizations prior to installation of the event</p>	<p>Accept in principle.</p> <p>The proposed language was integrated into the paragraph and "event phase 2" was included parenthetically.</p>

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23	DH	4.8.5	A risk assessment should be started early in event phase 1, while planning the venue and site design. See previous comments on phases	Propose: A risk assessment should be started early in the process of planning the event, while planning the venue and site design.	Accept in principle. The proposed language was integrated into the paragraph and "event phase 1" was included parenthetically.
24	DH	4.9.5	If an IMS is implemented within the event, the ESMP team should be integrated into it at the beginning of event phase 1 See previous comments on phases	Propose: If an IMS is implemented for the event, the ESMP team should be integrated early in the planning process of the event.	Accept in principle. The proposed language was integrated into the paragraph and "event phase 1" was included parenthetically.
25	DH	4.9.7	Unless the event organizer is acting as the health and safety coordinator, the health and safety coordinator could serve as an assistant safety officer on the IMT, if an IMT is used. This would be especially appropriate in a large or complex incident. Replace in with for	Propose: Unless the event organizer is acting as the health and safety coordinator, the health and safety coordinator could serve as an assistant safety officer on the IMT, if an IMT is used. This would be especially appropriate for a large or complex incident.	Accept
26	DH	4.9.11	For events utilizing an incident management system, the event organizer must have the event management center staffed at all times during event phase 2. See previous comments on phases	Propose: For events utilizing an incident management system, the event organizer must have the event management center staffed at all times during operational portion of the event.	Reject The use of "event phase 2" is purposeful, here, and accurately describes when the event management center must be staffed.
27	DH	5*	Event phase 2: the event, at the venue/event site See previous comments on phases	Propose: Installation, Operation & Dismantle, Removal and Return	Accept in principle. Include "Event phase 2" parenthetically.
28	DH	5.1.2	The event organizer must carefully consider how to minimize reasonably foreseeable risks for both load-in and load-out. Suggest that we need stronger language than "consider"	Propose: The event organizer must carefully evaluate how to minimize reasonably foreseeable risks for both load-in and load-out.	Accept

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29	DH	5.2.1	This aspect of event phase 2 begins after the event has concluded See previous comments on phases	Propose: This aspect of the event begins after the event has concluded.	Reject The use of "event phase 2" is purposeful, here, and accurately describes the phase within which load-out begins.
30	DH	5.2.3	Load-out must not commence until all personnel not involved in load-out (e.g., attendees) are off-site. This is often possible and is therefore unenforceable	Propose: The event organizer must mitigate the foreseeable hazards of the load-out. This includes mitigating the risks to attendees and personnel who have no role or responsibility for the load out. One of the most effective ways of mitigating the risks to attendees and other personnel is to remove them from the location where the load out will take place prior to commencing the load out.	Accept in principle. This language has been added to the annex, but with "must" changed to "should." See also comment # 71, which further clarifies when load-out commences.
31	DH	6	Event Phase 3: post-event See previous comments on phases	Propose: "Post Event"	Accept in principle. Include "Event phase 3" parenthetically.
32	SL	2	Add definition for "accident": An undesired event that results in personal injury or property damage. This differentiates it from "incident," which some mistakenly use interchangeably with "accident."	Add "Accident" to the definitions to compliment the definition of "Incident". To the casual observer they may be interchangeable, however occupational safety and health professionals use the terms differently, accidents are a type of incident and have a narrower definition, an accident typically implies a much more serious outcome. According to the OSHA.gov site: ACCIDENT - The National Safety Council defines an accident as an undesired event that results in personal injury or property damage. INCIDENT - An incident is an unplanned, undesired event that adversely affects completion of a task. This would require a modification to 2.21.	Reject. The dictionary definition of "accident" is acceptable in the context of this standard, "incident" is already defined in the document (2.21), and the two types of incidents in this standard (major and minor) are important to their use in this document.

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33	SL	2	Add a definition for "Near Miss."	Per the OSHA.gov site and risk management documents I found, defines as follows: NEAR MISS - Near misses describe incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred. See PPT doc available at : https://www.osha.gov/sites/default/files/2018-12/fy11_sh-22224-11_3_Risk_Management.pptx	Reject "Near miss" is used only once in this document and the dictionary definition of the words are acceptable.
34	SL	2.11	Split this definition into two as follows: 2.11 Event stakeholders: Persons, companies and organizations or their representatives, with a financial, reputational or contractual "stake" or risk associated with the event. X.XX Event staff: Anyone present within the event site who is working, including volunteers; this includes event management, production team, supervisors, employers, employees, contractors, subcontractors, laborers, volunteers, performers, venue owners or venue operators, vendors, etc. May be also be referred to as event personnel, or event workers. If this change is accepted, 4.3.5 will need to be changed from "event stakeholders" to "event staff".	I have a definition issue here with the term "Stakeholder". In all forms of business and events apply here, the term "stakeholder" refers to someone with an economic, political, reputational or contractual/legal "stake" in the undertaking, those persons or entities with an interest or concern in the enterprise. The synonyms are "investor, shareholder, backer, sponsor, participant or patron (in the enterprise). I understand one could argue the "participant or patron" angle here, but can we consider bifurcating this definition into two as follows?	Reject "Stakeholders" was added in the last public comment period and replaced other terms. The TG prefers the term "stakeholders" here because it is a broad term that applies to everyone involved in the event, including staff. See also comment #69
35	SL	2.12.1	"During this event phase, risk assessments are completed,"	Consider using "initiated" or "established" instead of "completed", as risk assessments are evolving and living documents.	Reject Although it is true that risk assessments are living documents, a risk assessment must be completed, even if it is later revised or updated.

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36	SL	2.12.3	"Typically, during this event phase, final accounting is completed; post event analysis takes place and reports are developed, reviewed, and discussed; rental items are returned; documentation is gathered and stored; and, assets are examined, repaired/replaced (as necessary), stored, and managed for future use."	Add "a post event analysis (PEA) is completed and circulated", or "after action reports (AAR) are completed and circulated'. If "AAR" is used, a new definition will be needed for that as well. NOTE: ON GOOGLE, "POST EVENT EVALUATION" SEEMS TO BE MORE COMMON IN NORTH AMERICA AND USED BY MORE EVENT PROFESSIONALS AND EDUCATIONAL INSTITUTIONS. *A change from "PEA" to "PEE" would also require a modification to 2.32	Accept in principle. 2.12.3 has been revised to address this proposal, related proposals, and additional concerns of the task group.
37	SL	2.15	Weather should be discussed at an event safety meeting.	Add "weather" to list.	Accept
38	SL	2.40	These are important items to include on a site map.	Change to "critical infrastructure; permanent structures; foliage; with specific attention paid to attendee entrances, exits, and circulation".	Accept in principle. Proposed language was integrated into existing definition of "site map."
39	SL	2.41	This addresses the needs of non-English speakers.	Add "in written and image form for non-English speakers."	Accept
40	SL	3.4	These are two topics that should be included in an event planning meeting.	Add to the list under 3.4: • Historical data on this or similar events • Attendee capacity and demographic	Accept
41	SL	4.1.3	This language allows for a safety department, which many actually use.	Modify "Oversight of the activities of the health and safety coordinator" to "Oversight of the activities of the health and safety department or coordinator."	Accept
42	SL	4.1.5	"Rules" is too general.	Modify to: "The event organizer must provide instruction and supervision, conduct relevant training, and ensure compliance with safety policies and procedures, communication methods, and other rules in effect on site."	Accept

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43	SL	4.2.3.1	Add "or a direct reporting subordinate" to the sentence rules out someone beholden to the event organizer being responsible for health and safety coordination, which would be no different than the event organizer filling the role.	Modify to: "The role of health and safety coordinator must not be filled by the event organizer or a direct reporting subordinate."	Accept in principle. Changes made to 4.2.3.1 and its related annex clarify the intent and meet the principle of the proposal.
44	SL	4.2.4	These should be added to the list of what a health and safety coordinator is responsible for.	Add the following to the bulleted list: <ul style="list-style-type: none"> • Prepare a staff Code of Conduct setting behavioral expectations and deliver to event organizer for inclusion into all subcontractor agreements, employment contracts and other vendor agreements. • Monitor compliance. • Monitor heat, cold, inclement weather; take periodic 'wet bulb globe thermometer' climate readings if appropriate in the areas work is conducted and advise as necessary. • Monitor vehicles, materials, equipment and debris on site for encroachment into areas required to be kept clean or clear. 	Accept in principle. Accepted with slight modification to the proposes language.
45	SL	4.2.8	Often, experts exist internally with the client or are hired to do some or all of these items. In those cases, it's important the safety coordinator, the person with the most knowledge of the event, to have a seat at the table during the process.	Change to: "The health and safety coordinator must also be authorized to evaluate, or participate in the process to evaluate the need for special services, including, but not limited to, the following:"	Accept in principle. Accepted with slight modification to the proposes language.
46	SL	4.2.9	These are also procedures the health and safety coordinator should have in place.	Add to the list under 4.2.9: <ul style="list-style-type: none"> • Evacuation • Incident response and mitigation procedures, e.g., spill mitigation and clean up. 	Accept
47	SL	4.2.9 and 4.2.10	Poor consistency with punctuation at the end of the text after the bullets, with some having a comma or period, and others not. All should be the same throughout the document. https://www.grammarly.com/blog/bullet-points/	Make punctuation within bullet points consistent throughout the document.	Accept in principle. The TG and editors will do their best to make all bullets and their punctuation consistent throughout the document.

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48	SL	4.2.11	These are additional points that are important for the health and safety coordinator to have a working knowledge of.	Add to the list under 4.2.11: <ul style="list-style-type: none"> • Severe or inclement weather and storm readiness • Public speaking • Presentation software for document preparation and presentation 	Accept first bullet point. Reject second and third.
49	SL	4.2.13.2	Modify to: “Contracts and agreements with contractors should specify a minimum amount of required insurance coverage and desired level of indemnity.”	Adding “required” to the sentence clarifies its meaning.	Accept
50	SL	4.2.13.3	Insurance is the producer’s responsibility, I’m reluctant to state the safety coordinator’s job includes “correctness, adequate coverage levels, and to determine if advice from a broker is required” since this is an organizers administrative task.	In my opinion, in a field where the average safety coordinator is already a stretch assignment, they should not be placed in a position like this where the organizer can claim the safety coordinator did not perform to the letter of this standard. LET’S BE CAREFUL HOW MUCH WE ARE PUTTING ON THE AVERAGE PERSON.	Noted; no action required. See comment #16, which revised the language of 4.2.13.3 to remove some of the language described.
51	SL	4.3.2	The health and safety coordinator will need support from the event organizer to get this done.	Modify to: “For the event safety management plan (ESMP) to function as intended, and depending on the size and complexity of the event, the event organizer should budget the time, funding and required resources for the health and safety coordinator to set up and prepare for the series of required meetings of relevant stakeholders.”	Accept

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52	SL	4.3.3	This was missing a couple things that should also be included during the communications of site safety rules.	Modify to: "During event phase 1, the health and safety coordinator should plan for the communications of site safety rules, which should include: • Briefings that will be held prior to event personnel entering the site • Contract riders or exhibits such as predetermined vehicle routes to be used, schedules with dark or quiet periods, descriptions of required testing and so on. • Site signage at staff entrances	Accept See also comment #17.
53	SL	4.3.10	This includes more specifics about how this documentation should be organized and maintained on site.	Modify to: "All necessary documentation required by applicable codes and the authorities having jurisdiction (AHJ) for the event shall be organized, maintained, and accessible on-site throughout all event phases."	Accept
54	SL	4.3.12	Seems redundant, I think something similar has been stated twice already.	No specific change proposed.	Noted; no action required.
55	SL	4.3.13	Seems redundant.	No specific change proposed.	Noted; no action required.
56	SL	4.3.14*	To be consistent, do we need to state which forms to use, or at minimum a "such as" comment, since there are common forms provided by OSHA?	Add to the relevant Annex: In the United States, the following OSHA forms may be helpful: • Employee's Report of Injury Form • Employer's Log of Work-Related Injuries and Illnesses (form 300) • Employer's Summary of Work-Related Injuries and Illnesses with personal information removed (form 300A) • Employer's Injury and Illness Incident Report (form 301) • Near Miss Form	Accept

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57	SL	4.5	Where does ESMP come from? I have never heard this acronym used, ever.	Capitalizing since it is a title of a document.	Reject Throughout the document, only the first word in each bold title is capitalized. This is also a detail that will be left to the editors.
58	SL	4.5.7	Overseeing the integration of the venue's plan elements into the ESMP may be necessary.	Add at the end: "and from the event's side, oversee the integration or layering of the plans that apply to the situation."	Accept in principle. The proposed language was adjusted to fit the situation. See also comment #20.
59	SL	4.5.8	This is simpler and clearer language. Shouldn't an EAP be produced regardless of whether "local regulation for the size or complexity of the event" requires it? It's not like it's a hard thing to do...	Modify to: "If an emergency action plan (EAP) is developed, it must be included in the ESMP."	Accept in principle. An emergency action plan is not optional, and the language was significantly clarified to reflect this.
60	SL	4.5.8.1	These should be included in what must be included	Add to the list under 4.5.8.1: <ul style="list-style-type: none"> • Procedures for, and authorities related to, show stop; • Lock out, tag out 	Add <ul style="list-style-type: none"> • Procedures for, and authorities related to, show pause and show stop; • Procedures for the control of hazardous energy
61	SL	4.5.8.1	It is redundant with bullet 3.	Remove bullet 4.	Accept in principle. The two bullets were combined into one.

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62	SL	4.5.13	These are also topics that must be evaluated in an ESMP.	<p>Add the following bullets:</p> <ul style="list-style-type: none"> • Threat Analysis • Public Relations and Communications protocols • Disabled staffing assignments include those staff assigned to assist the disabled and known disabled event staff on site. • Contact list that includes the nearest: <ul style="list-style-type: none"> ○ Commercial airport, local helipads and heli-spots. ○ Urgent care facility ○ Local hospital with a 24-hour emergency room ○ 24-hour pharmacy ○ Hazardous materials and spill clean-up vendor ○ 24-hour fuel and propane source 	Accept
63	SL	4.7	<p>I feel like the original language did not do justice to the subject of "Event Risks," so I recommended this expansion of the section and included an example for the powers that be to think about.</p> <p>I understand this may be met with opposition, but I would not forgive myself if I didn't at least call it out as, in my opinion, a substandard offering on such an important topic like event risk. I don't like that it went to 5 digits in the headings, it may still need work.</p>	<p>Replace 4.7 with the following:</p> <p>4.7 Event risks</p> <p>4.7.1 All staff shall be trained on the topic of hazard identification and mitigation with reminders in the daily event safety 'stand-up' meeting described in 4.3.5.</p> <p>4.7.2 Planned foreseeable risks are the risks identified in the risk assessment(s), which is/are completed in advance of the event (event phase 1). These planned risks include but are not limited to the following:</p> <p>4.7.2.1 Medical services and facilities.</p> <p>4.7.2.1.1. If medical service facilities are planned, they must be evalu-</p>	<p>Accept in principle.</p> <p>4.7.2 was revised to better reflect the intent of the TG.</p> <p>Proposed 4.7.2.3 was removed because it is already addressed by 3.1.</p> <p>4.7.3 was modified from that which was proposed to better match what the TG thought was the intent of the proposal.</p> <p>Proposed 4.7.3.1 was included as an annex to 4.7.3.</p> <p>Other language revisions were made to improve flow and intent.</p> <p>The remaining sections of 4.7 were renumbered accordingly.</p>

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				<p>ated for the reasonably foreseeable hazards at the event, the type of work being performed, and follow the guidance provided in chapter 5, Medical, in the <i>Event Safety Guide</i> (2014, Event Safety Alliance).</p> <p>4.7.2.1.2* Medical services and facilities must be available either at the event venue or in the local environment for all persons on site (event personnel and attendees). These services and facilities must be available throughout the entire event duration; from the time that the event first occupies the event site until all work is completed.</p> <p>4.7.2.2* Events with tents or overnight camping present unique risks that must be identified, evaluated, mitigated, and controlled.</p> <p>4.7.2.3 Food and Beverage operations must be compliant with local health department regulations.</p> <p>4.7.2.4 Known hazardous conditions requiring mitigation in advance of the event opening (e.g., event phase 1), including cable runs, propane storage, buffer zones below overhead work, etc., must be identified and precautions taken to ensure safe site operations.</p> <p>4.7.3 Unplanned risks are the unforeseen risks identified during the operational execution of event phase 2.</p> <p>4.7.3.1 Identification and mitigation of unplanned risks requires constant monitoring by event stake-</p>	

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64	SL	4.8.4	A bit more detail would be helpful in describing what should be in a risk assessment.	Modifying the bullet points under 4.8.4 to: a. Identify the hazards and locations, be sure to include natural hazards, human caused hazards, and technological hazards. b. Decide who, what, and how someone or something could be harmed, c. Evaluate the risks, and their frequency and severity, determine response decision. d. Determine response control measures to mitigate the risks, d. Record the findings, monitor the risks, and e. Review the risk assessment regularly.	Reject 4.8.4 in its current form is a simple representation of how to complete and document a risk assessment. The proposed language, although more comprehensive, goes beyond simple. The related annex material includes more detail.
65	SL	4.8.5	Reasonably foreseeable risks should always be part of a risk assessment.	Modify to: "A risk assessment outlining reasonably foreseeable risks should be started early in event phase 1, while planning the venue and site design.	Accept
66	SL	4.8.8	This language mentions that a risk assessment is an evolving document.	Modify to: "The risk assessment is an evolving document, it should."	Reject Similar language to that which is proposed is in the bullet under 4.8.8.
67	SL	5.1.1.1	This is better language.	Change the last word "built" to "installed."	Accept
68	SL	5.1.4	Material handling equipment should also be included.	Add a sentence after first sentence: "This includes the safe operation of material handling equipment on site by competent and qualified operators."	Accept in principle. A revised version of the proposed language was integrated into the existing language in the paragraph.
69	SL	5.1.8	Food and beverage distribution locations should also be included.	Modify bullet 4 under 5.1.8 to: • Food and beverage distribution locations and water stations	Accept

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70	SL	5.2.1	This additional language adds clarity.	Modify to: "This aspect of event phase 2 begins after the event has concluded and the attendees have departed the venue."	Accept in principle. 5.2.1 has been revised to address this proposal, related proposals, and additional concerns of the task group.
71	SL	5.2.2	I think even staff sounds better than stakeholders.	Change the words "all stakeholders" to "all event staff."	Reject "Stakeholders" was added in the last public comment period and replaced other terms. The TG prefers the term "stakeholders" here because it is a broad term that applies to everyone involved in the event, including staff. See also comment #33.
72	SL	5.2.3	In most cases, the public are still on site, but outside the perimeter of the venue area, e.g., in a parking lot, campground, or other location on site.	Change the last few words from "are off-site" to "have departed the venue."	Accept in principle. 5.2.3 and its annex has been revised to address this proposal, related proposals, and additional concerns of the task group.
73	SL	5.2.4	The current language improperly uses the term stakeholders.	Change to: "If event staff are not under the direct control or employ of the event organizer (such as subcontractors), the health and safety coordinator must take all reasonable efforts to inform them of the assessed risks, which could be integrated into an agreement or contract."	Accept
74	SL	5.2.5	Stakeholder does not seem appropriate here.	In bullet 6, replace "stakeholder" with "event staff."	Reject The definition of "stakeholder" matches the word's use here.

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75	SL	5.2.5	Bullet 6: I firmly believe the health and safety coordinator should NOT be given any responsibility or mentioned here for determining or considering if a department working on site has "sufficient numbers" of staff. That is the responsibility of the organizer.	No specific change proposed.	Noted; no action required.
76	SL	A2.12	This is a good point, however, the entire event industry, with over a million people in the USA alone, specifically uses a variation of this and since it is used by most event people, it is an "industry standard" regardless of what the this document states. Pre-production, Production, Post production are the industry standard, though some add in concept development phase prior to an event being accepted by the client or organizer.	No specific change proposed.	Noted; no action required.
77	SL	A4.1.4	As a producer, event organizer, and a partner in an global event agency, I reject the "should be" in this paragraph in favor of "reasonably". There are often extenuating circumstances, such as negligence and gross negligence by others that the organizer should not be responsible for.	Insert "reasonable" after "all."	Accept
78	SL	A4.1.5	There is a reference to OSHA General Duty Clause, 5(a)(1) but I always find it fair that if you are going to cite the employer's responsibility, you should also cite the employee's responsibility which is 5(b) the next paragraph down: (b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.	Add to the end of A4.1.5: "It is important to note that section 5(b) of the same Act ("General Duty Clause") similarly requires that, "Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct."	Accept
79	SL	A4.8.1.4	Agree, but we should recommend even handwritten notes will be of value that you did your due diligence in court one day.	No specific change proposed.	Noted; no action required.

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80	SA	Title page	This is an awkward title that seems to mix two large and important (but different) concepts: (a) event planning and management (when things go according to plan); and (b) planning for major incidents that force organizers to deviate from their plans. Some of the mission creep of this draft might be alleviated by separating these issues into two documents.	Separate the two issues implied in the title into two separate documents.	Accept in principle. The title of the document was revised to reflect the true content of the standard. New title: "Event Safety – Planning and Management"
81	SA	Introduction	I'm fine with a discussion of stakeholders, but less comfortable with "event safety management planning team." Lots of "suppliers and contractors," for example, are excluded from event planning, but the first two sentences of the second paragraph use "must" and then "would" in ways that muddy whether their presence is required or not. The third sentence calls them "integral," which suggests that omitting them is below the standard of care set by this American National Standard. I can't tell if this paragraph is imprecisely worded, meaning it just requires editing, or if it's not carefully enough considered. Probably both. In the last paragraph of the Introduction, are these really the goals of this standard? I would think discussion of generally-required elements of an event plan would be plenty for one standard.	No specific change proposed.	Noted; no action required. The specific definition of "event safety management plan team" has been removed in favor of the dictionary definition of the term "team" used in association with event safety management planning. Slight revisions to some of the introduction language were made to clarify the intent of the TG.
82	SA	1, Scope, purpose and application	The first correction substitutes the right word; the second one uses the legally correct term.	In the second sentence, reword the last part of the second sentence to "reduce risk as much as reasonably practical practicable and to respond appropriately reasonably when an incident occurs...."	Accept
83	SA	1.1	I hate nitpicking what should be boilerplate, but this purpose is way overbroad.	No specific change proposed.	Noted; no action required.

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84	SA	1.2	Who are "users?" Does "enforcement officials" refer to law enforcement or code enforcement? This sort of ambiguity should be cleaned up at the Task Group editing stage.	No specific change proposed.	Noted; no action required. The entire phrase with the term "enforcer" was removed and the proposal is therefore no longer needed.
85	SA	2	Forty-three definitions are far too many, and many seem to be made-up terms that are merely descriptive, not terms of art that require definitions. This section needs a great deal of pruning.	No specific change proposed.	Noted; no action required.
86	SA	2.4, 2.5	Emergency Action Plan, Emergency Operations Plan. Where do these definitions come from? In my experience, they are pretty interchangeable. Re the EOP definition, I've never seen an event plan created by a government agency.	No specific change proposed.	Noted; no action required. FEMA is the source of the core of these definitions. "Event plan" is not one of the definitions described in the comment.
87	SA	2.6	Event. Why not use the definition already in other ESWG standards? What's gained by using this instead?	Use definition of "event" used in other ANSI standards.	Reject Two of the current ESWG ANSI standards do not include a definition of "event" (Weather and Structures) and the other three have different definitions of the term. This definition is similar to that which is used in other ESWG ANSI standards but also includes necessary elements required in this standard.
88	SA	2.7	Event duration. This definition seems unnecessary. Why divide the duration of an event this way? This ignores ingress and Zone Ex. Rather than create a defined term, the period of time an event plan should cover should be discussed so readers can decide the scope of their own EAP.	Remove definition of "event duration."	Reject The definition is necessary to accurately describe its meaning as used in 4.7.1.1. In addition, in developing a standard, it is important to establish precise meanings for words and phrases that have previously been used and misused but not well defined.

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89	SA	2.8	Event health and safety. This definition is word salad and does not seem necessary. Is it laws, framework (whatever that means), rights and duties of all parties? Or are health and safety two separate issues with their own definitions.	Remove definition of "event health and safety."	Reject The definition is specific to its use in this document and necessary to accurately describe its meaning as used in 4.3.8 and 4.6.1. In addition, in developing a standard, it is important to establish precise meanings for words and phrases that have previously been used and misused but not well defined.
90	SA	2.9	Event management center. Another unnecessary defined term. There is no need to create a new term for the ones listed in the definition.	Remove definition of "event management center."	Reject The definition is specific to its use in this document and necessary to accurately describe its meaning when it is used throughout this document. In addition, in developing a standard, it is important to establish precise meanings for words and phrases that have previously been used and misused but not well defined.
91	SA	2.11	Event stakeholders. This definition includes so many roles as to define nothing, as indicated by "etc." and "May also...."	Remove definition of "event stakeholders."	Accept The dictionary definition of "stakeholder" is acceptable in the context of this document.
92	SA	2.12	Event phases. Other ESWG standards use "Ingress, Circulation, and Egress" as the three operational (FOH) temporal phases of an event. Planning is pre-event; analysis and reporting is post-event. If the Project Management Institute is gospel for this standard, then it should follow PMI's phases rather than mashing them together.	No specific change proposed.	Noted; no action required.

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93	SA	2.13	Event safety management plan (ESMP). A made-up definition that are likely to be weaponized in future lawsuits to spread blame to parties with little operational authority.	Omit this definition.	Reject This term is needed to describe what has previously been described inconsistently in other standards and literature. This definition is also specific to its use in this document and necessary to accurately describe its meaning when it is used throughout this document. It is important to establish precise meanings for words and phrases that have previously been used and misused but not well defined.
94	SA	2.14	Event Safety Management Plan team (ESMPT). A made-up definition that are likely to be weaponized in future lawsuits to spread blame to parties with little operational authority.	Omit this definition.	Accept See also comment #115.
95	SA	2.15	Event safety meeting. Does it have to be daily? Stand-up, not seated? Is it a deviation from this standard for stakeholders to have their own meetings rather than joining one big meeting? This is overbroad and adds no value.	Omit this definition.	Reject The definition is specific to its use in this document and necessary to accurately describe its meaning when it is used throughout this document. The definition of "stand up" meeting has been removed and integrated into 2.15, which may remove the need for this proposal.
96	SA	2.17	Health and Safety. This definition is not necessary (see 2.8) nor does it make sense. Health and safety may be regulated by laws, rules, principles, but they are not those things.	No specific change proposed.	Noted; no action required.
97	SA	2.18	Health and Safety Coordinator. Few, if any safety people have sufficient expertise in workplace safety (BOH) and crowd management (FOH) to be in charge of both. If a standard gets ahead of industry practices this way, then no professional can meet the new standard of care. This is a foundational problem with this standard.	No specific change proposed.	Noted; no action required.

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98	SA	2.28	Mass gathering. How is this different from an "event?" Why are both terms needed?	Remove either the definition of "mass gathering" or "event" or both.	Reject The definition for "mass gathering" is used multiple times in the annex and was added in response to a previous public comment that desired to draw a connection between how FEMA defines the term and its use in this standard. See also the response to comment #87, above.
99	SA	2.37	Security. This definition confuses the scope and meaning of the term used in ES1.40-2023, Event Security. That standard can be added to the normative references in 1.5, then this definition can be omitted.	Omit this definition.	Reject Having a definition in one of the documents listed in 1.5 (normative references), does not necessarily preclude its inclusion in this standard, especially if it differs from that which is described in the referenced document, which is the case here.
100	SA	2.42	Stand-up meeting. If this term is used in the event industry (I've heard of "toolbox talks," but this is new to me) and adds value to this standard, then it should be integrated into 2.15.	Integrate into 2.15, event safety meeting.	Accept In response to a public comment, the definition of "stand-up meeting" (2.42) was previously added to clarify its meaning as used in 2.15, event safety meeting. However, integrating it into 2.15 rather than defining it separately better demonstrates the relationship between the two.
101	SA	3.2	What is this sentence intended to convey? It's worded as a requirement ("shall"), but it's not clear what exactly is the required action. Sloppy use of words of requirement is catnip to plaintiff's lawyers.	No specific change proposed.	Noted; no action required.

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102	SA	3.4	Same problem. If "every event, regardless of the size," is required to have something called an "initial, comprehensive planning meeting," what is the source of that requirement? ESWG standards are supposed to be scalable, from local strawberry festivals to stadium shows, but this sounds like one size must fit all.	No specific change proposed.	Noted; no action required. This standard is intended to raise the safety "bar" and requiring an initial planning meeting, even for small events, is a strong step in that direction. Scalability comes into play as the length and depth of the initial planning meeting can be scaled to meet the needs of the event.
103	SA	4.1.1	This statement misses the many health and safety issues for which the event organizer delegates responsibility to another party by contract. Any big event organizer would justifiably scream if they saw this language and the corresponding (legally incorrect) language in 4.1.1.1 ("must?!").		Accept in principle. The language in 4.1.1 and 4.1.1.1 has been revised according to comments #10 and #11
104	SA	4.1.3	What is an "overall health and safety framework?" Is that a specific plan? A general policy of trying to work safely? Stocking up on Band-Aids? The authors mean something here, but as is the case throughout the document, it doesn't translate onto the page.	No specific change proposed.	Noted; no action required. A "framework" a basic structure underlying a system or concept. In this case the system or concept is health and safety.
105	SA	4.1.6	Same as 4.1.3. There must be some reason the authors contend that 'frequent review and updating' is necessary, but the document doesn't say why. A requirement without an explanation is unlikely to be followed.	No specific change proposed.	Noted; no action required. This standard is intended to describe what should or must be done, and sometimes how, but space and scope of this standard do not always allow for full explanations.
106	SA	4.2.3	The requirement that every event, no matter how small or low-risk, have a dedicated "health and safety coordinator" with no other duties is simply not realistic, and will expose many event operators and other stakeholders to new liability. A standard should not do that.	No specific change proposed.	Noted; no action required. This standard does not require a dedicated health and safety coordinator with no other duties, and revisions to 4.2.3.1 and its related annex should help clarify the intent.

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107	SA	4.2.4	This is a massive scope of work for a "health and safety officer." What is the authority? Does the TG contend that people currently fill this role for event organizers, or is the TG creating a new requirement? Given that only the most resource-rich events could afford a "qualified person" to fill this role with no other responsibilities, this provision looks like more lawyer catnip, which obviously should be avoided.	No specific change proposed.	Noted; no action required. Authority for the described duties of the health and safety coordinator is granted by the event organizer, and this standard does not require a dedicated health and safety coordinator with no other duties.
108	JJ	3.5	In 3.4, it says we need "an initial, comprehensive planning meeting" but in 3.5 it refers to "the event safety meeting" and does not really specify a time on this meeting.	In 3.5, instead of saying "the event safety meeting" change it to either "the initial" or "an."	Reject An event safety meeting is defined in 2.15 and refers to a daily "toolbox" type meeting, whereas an initial comprehensive planning meeting is intended to be an entirely separate and necessary meeting held in phase 1. Both are needed and the suggested language does not improve clarity.
109	JJ	4.2.11	The first bullet point lead with "Events..." — Does that really need to be said? Wouldn't the rest of the qualification be sufficient? Or we want to be *that* obvious?	Remove the first bullet under 4.2.11.	Reject Although it may seem obvious, the requirement described in the first bullet under 4.2.11 is essential experience and knowledge necessary to meet the definition of a qualified person (see 2.33).
110	JJ	4.3.1	Seems a little run on to me. Maybe that's ok? Or find a way to make two sentences?	Revise to remove awkward, long sentence.	Accept 4.3.1.1 added.

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111	JJ	4.3.2	"Of relevant stakeholders" does not seem right in this context.	Change "of relevant stakeholders" to "with relevant stakeholders."	Reject There is a difference between the health and safety coordinator setting up a series of meetings <u>with</u> relevant stakeholders and setting up a meeting <u>of</u> relevant stakeholders. "With" suggests that the health and safety coordinator must attend but may meet alone with relevant stakeholders, one-at-a-time. Whereas, "of" suggests that the health and safety coordinator set up a meeting where all stakeholders are invited to attend with or without the health and safety coordinator. The latter (of) is what is intended.
112	JJ	4.3.12 and 4.3.13	I think this should be closer in proximity to 4.3.3.	Insert 4.3.12 and 4.3.13 directly under 4.3.3 and renumber.	Accept
113	JJ	4.5.3 and 4.5.4	Communications standard is not ready/ cannot be referenced for this? (As I believe we may have more protocols for this in that draft).	Reference the Communications standard in these sections.	Reject An ANSI Communications standard is under development but not yet completed.
114	JJ	4.9.7	Contradicts 4.2.3.1 BECAUSE in 4.2.3.1 it says that the organizer must not be the health and safety coordinator.	Reword 4.9.7 to remove conflict with 4.2.3.1.	Accept Changes to 4.2.3.1 in response to public comments remove this contradiction.
115	JJ	4.9.14	We have been told that we should not have definitions that are not used. Although there is a definition included for ESMP - meaning ESMP team, it is not used in the document. I think it is clearer with a definition of ESMP included but I think it needs removed.	Remove definition of ESMP.	Accept See also comment #94.
116	TG	Throughout	There does not seem to be an advantage to using the term "event phase x" to refer to each phase instead of simply "phase x."	Replace all occurrences throughout the document of "event phase x" with simply "phase x."	Accept