



ADDENDUM TO GUIDANCE NOTICE

**EWPA Technical Bulletin
MEWP Controls – Design and Modification
3 October 2012**

Attention: EWPA Manufacturers and Suppliers

As you are aware, the EWPA recently released a technical guidance note advising owners of an appropriate response to Third Party safety alerts recently issued by John Holland and Abigroup re their concern about the safe design of some platform controls.

Prior to the release of this Technical Guidance Note these Third Party Safety Alerts had resulted in MEWPs being taken off site.

The technical guidance note issued by the association advised owners of affected equipment to contact the manufacturer with regard to any matter concerning the safe design of an MEWP.

In relation to the two most recent safety alerts, regarding protection of controls against inadvertent operation, to further assist owners the EWPA requests all manufacturers demonstrate:

1. How MEWPs supplied by them after July 2011 meet the requirements of AS1418.10-2011 clause 2.6.4.
2. That if there **have** been any modifications or changes to design e.g. guards after July 2011, Manufacturers need to advise if these are available for fitment to pre-2011 MEWPs in order to comply with the requirements of AS1418.10-2011 clause 2.6.4.
3. That if there **have NOT** been any modifications or changes to design, Manufacturers need to demonstrate how the existing controls are effective in controlling newly identified risks e.g. John Holland and Abigroup's concerns re the risk of unintentional operation.

The intent of such advice is to assist owners obtaining clearance from Principle Contractors for their MEWPs to be used on the principle contractors' worksites.

Your cooperation in this matter should see a satisfactory resolution to the difficulties being experienced by owners at present.

GUIDANCE NOTICE

EWPA Technical Bulletin

28 September 2012

The Elevating Work Platform Association (EWPA) is the peak Industry Association representing manufacturers, suppliers, rental fleet owners and end users of Mobile Elevating Work Platforms in Australia.

MEWP Controls – Design and Modification Information:

In recent months there have been two incidents involving unintentional operation of upper control box joystick controllers on scissor lifts.

In an attempt to prevent reoccurrence, End Users have been requesting that the Manufacturers Original Design be modified e.g. by fitting additional guarding.

As a result, Owners are sometimes modifying their equipment to comply with such requests.

The Association is concerned that such modifications have not been authorised by the equipment manufacturer; are sometimes of an ad-hoc nature and may not fully address the risk; and may introduce new hazards as a result. See Fig 1.

Any person(s) who modifies an MEWP will take on the obligations of a Designer and/or Manufacturer in accordance with Workplace Health and Safety Regulations.

Further, such modification(s) may constitute an alteration to the design and require a re-submission of engineering documentation from the Manufacturer as well as formal notification to the respective Workcover Authority as an alteration to Registered Plant Design.



Fig 1: Unauthorised 'Adhoc' guard (arrowed) welded above Manufacturers original guard may cause scissor lift to become unstable if hoses, leads etc. become snagged on it.

Other Information:

In 2011, a new version of AS1418.10 was released and requires all control devices to be protected against activation other than that initiated by the operator. Further, if a "deadman" device (trigger or button, etc) is integral with the motion control the standard requires the deadman device to be protected against inadvertent actuation.

Some pre 2011 MEWP's may lack guarding (or have insufficient guarding) to minimise the likelihood of unintentional movement.

The Association understands that End Users and Owners are seeking a timely resolution to protection of controls, and the Association would endeavour to encourage the same.

However appropriate solutions may take some time to develop and as an interim measure, it may be possible for alternative risk controls to be implemented.

EWPA Recommendations:

The Elevating Work Platform Association recommends the following:

1. End User Responsibilities:

- i. MEWP's should only be used for the purpose they are designed for and should not be modified in any way.
- ii. End users should advise Owners of any identified risks arising from the use of plant that are not managed by the original design.
- iii. End users should consider implementing self managed interim risk control measures which do not alter the design of the MEWP (while appropriate solutions are being developed)

In the case of scissor lifts where unintentional operation of upper control box joystick controllers is possible, End Users should consider the following when the Scissor lift is not in use:

- Activating the Emergency Stop Button before working from the platform
- Switching off the engine

2. Owners Responsibilities:

- i. Owners should review all new information regarding the use of the equipment they own.
- ii. Should advise Designers and/or Manufacturers of any identified risks arising from the use of plant that are not managed by the original design.
- iii. In the case of upper control box joystick controllers on scissor lifts, Owners should consider the original design and identify if the risk of unintentional operation is managed.

Unintentional operation may be caused by:

- Operator inadvertently leaning on the joystick controller and activating both the 'Deadman' device and the joystick controller
- Hoses, leads or other objects etc contacting the joystick and activating both the 'Deadman' device and the joystick controller

Management of unintentional operation may include:

- Guarding
- Drive and lift functions disabled after nominated 'inactivity timeout' period
- Design of Deadman' device or control logic to preclude simultaneous activation

Where unintentional operation is possible (or where Owners are not sure), Owners **must not** make any changes to the design of MEWP's but should instead seek advice and assistance from Manufacturers.

3. Designers or Manufacturers (or their Representatives) Responsibilities:

- i. Should review all new information regarding the use of their original design and as necessary revise control measures:
 - When an existing control measure has been identified as ineffective in controlling the risk
 - If a new hazard or risk is identified
 - If the results of consultation indicate that a review is necessary
- ii. Manufacturers should advise owners of the following:
 - Estimated time required for review of new information
 - Estimated time for redesign(if necessary)
 - Instructions for conducting retrofit and associated costs

The EWPA stresses that it is not adverse to addressing any safety issue that may arise with the use of MEWPs. However, any such issue should be properly considered and any modification properly designed and implemented. In order for such issues to be adequately and efficiently addressed we would request that the Association is informed and we will do everything possible to ensure, where appropriate that the industry is informed and an adequate response is obtained.