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## **HEALTH AND SAFETY COMMISSION**

### **CONSTRUCTION INDUSTRY ADVISORY COMMITTEE (CONIAC)**

#### **ENSURING ADEQUATE DRIVER VISION FROM CONSTRUCTION PLANT**

##### **Summary**

**This paper addresses the current position concerning driver visibility of earth moving equipment lift trucks and describes HSE activity**

##### **Issue**

1. Workplace transport is one of HSE's priority topic programmes. The second largest cause of fatal accidents in construction involves the use of vehicles on site. The appropriate safe management of site transport is deemed to be a key requirement to ensure a safe site. Published guidance is provided by HSG 144 'Safe use of vehicles on construction sites.' As a rough 'rule of thumb,' driver vision should be 1.0 x 1.0 m around a machine where there is a risk from inadequate driver vision (i.e. the driver should be able to see points that are one metre from the vehicle and one metre above ground level, subject to the 'risk' caveat).

##### **Background**

2. The UK's Supply of Machinery (Safety) Regulations (SMS Regulations) implement an EU 'product' directive and set standards, through essential health and safety requirements (EHSRs). Suppliers must ensure that their vehicles comply with the EHSRs. There is a specific EHSR requiring adequate operator visibility, either by direct vision or by vision aids. Where there is a relevant harmonised standard, a supplier can choose to supply machines that comply with the requirements of the standard and they are then deemed to have

complied with the relevant EHSRs covered by that standard. Where a member state (MS) considers that a harmonised standard is deficient, the MS is obliged to take up the matter at the European level.

3. There are harmonized standards covering operator visibility for industrial trucks which includes telehandlers; and for earthmoving machinery which includes 360<sup>0</sup> excavators, dump trucks, wheeled loaders, etc. The UK suppliers claim conformity with these standards and are therefore deemed to comply with the EHSRs.

### **Current position**

4. HSE has serious concerns about the adequacy of these standards and is formally challenging the harmonised status of the EN 474 standards in Europe.
5. Due to two different standards, EN 1459 1998 Safety of Self propelled variable reach trucks and EN 474-1 Earth moving equipment Safely Part 1 General requirements; the work has been split into two different work streams. A four point strategy has been developed by HSE to take this issue forward and reduce the risk from inadequate driver visibility, namely:

### **Point 1: STANDARDS**

6. HSE action includes representation on ISO 5006 to which EN 474 refers.

### **Point 2: EUROPE**

7. Approaches from UK to the Article 6.2 Committee Working Group concerning interpretation of EN Standards arguing that compliance with that EN474 and the link to ISO 5006 does not give compliance to the requirements of Supply of Machinery Regulations. If this is the case then new machinery may be being incorrectly CE marked, as suppliers must ensure that their vehicles comply with the Essential Health & Safety Requirements [EHSR].

### **Point 3: SUPPLIERS/MANUFACTURERS**

8. Our approach to Europe needs to be resolved before a firm approach can be made to manufacturers. Meetings have already been held with manufacturers to explain our intent with respect visibility.

## **Point 4: USERS AND HIRERS**

9. The Provision and Use of Work Equipment Regulations (PUWER) provide opportunities for action by HSE (i) if an EC marked machine is not being used in conformity with the manufacturer's directions, (ii) if a machine does not need to be EC marked (e.g. older machines) or (iii) if an EC marked machine is being operated in a manner that creates an actual risk on site. In these cases, HSE can take action involving the user under PUWER but cannot take action directly with the supplier/manufacturer under the SMS Regulations. PUWER enables HSE to make approaches to users and hire companies requiring them to assess the suitability of their machines and to address issues of adequate driver visibility.

### **Self propelled trucks**

10. Self-propelled trucks are being tackled separately as the standard is more specific in the requirement for visibility. This means that the European dimension is considered to be less onerous. An HSE project group, including manufacturers, will be addressing what constitutes adequate visibility for new machines.

### **Next steps**

11. Following discussions with EC, HSE proposes to meet with suppliers/manufacturers of earth moving equipment to consider improving the all-round visibility on such machines to ensure compliance with the Supply of Machinery (Safety) Regulations.
12. It is anticipated that self-propelled lift truck manufacturers will be made aware of HSE requirements before Christmas.

### **Action**

13. CONIAC members are invited to note the current state of developments on vehicle rear visibility.

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