The manufacturers' response to the Atlantic Alliance letter

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on behalf of CECE, AEM and CEMA



The CEA

- The Construction Equipment Association (CEA) is the trade association that represents the UK Construction Equipment sector.
- Our members are established Original Equipment Manufacturers (OEMs), component and accessory suppliers, the trade press and specialist research companies.
- Company size varies from major multinationals to micro businesses.



The CEA

- In 2005, CEA member companies contributed to the £8.5 billion turnover of the UK construction equipment industry, employing over 60,000 people.
- Many of our members export over 80% of their production to more than 150 export markets. Our members are required to manufacture products of proven reliability to high quality standards with a full after sales service.



Members include

..... most OEMs that supply equipment to the quarry industry



CECE

is the recognized organization representing and promoting the European Construction Equipment and related industries, coordinating the views of National Associations and their members by influencing the European/National Institutions and other organizations worldwide to achieve a fair competitive environment via harmonized standards and regulations. CECE national associations represent 1200 member companies.

www.cece-eu.org



AEM

is the North American based international trade association advancing the global business-development activities of the off-road equipment manufacturing industry in areas including technical and safety matters. AEM advances the ideal of fair and free trade worldwide.

AEM membership includes some 700 companies.

www.aem.org



CEMA

is a Japanese trade and business development resource for 74 companies manufacturing equipment, products, and services used worldwide in the construction, agriculture, industry, mining, quarry, forestry, material handling, and utility fields.

CEMA is active in promoting interchange with the US and European construction equipment.

www.cema.or.jp



Working together

- Need more communication.
- Improvements through effective collaboration.
- Need to jointly develop a document that shows how your aspirations coincide with, and extend, existing safety standards requirements.



Latest QNJAC draft Guidance

Some quite significant changes to previous draft and Atlantic Alliance letter.

- Specific requirements for access systems on excavators removed.
- Landing platform only wanted when door cannot be opened from ground level.
- Simplified requirements in high winds.
- Sections on steering systems, vibration and isolating seat belt interlocks removed.



Most significant of remaining issues

- Inclined stairways
- Visibility
- Lighting rigs
- Seat belt indicators
- In-cab noise below 75db(A)
- Retrofits



Inclined stairways

- What does the AA refer to as a stairway and what is a ladder?
- What angle meets the definition of "inclined"?
- Standards define a stairway as an access system having an inclination less than 50%
- There needs to be objective criteria so that the manufacturer knows that his interpretation is acceptable.



Inclined stairway

- A cantilever access system is far more difficult to achieve for an excavator, where it extends outside the machine width
- What size machines are included in the Atlantic Alliance requests?
- Some requirements will not be practical on smaller machines due to space, structure, etc.



Visibility

- Requirement for 1.0m x 1.0m is not consistent with the internationally recognised criteria of 1.5m x 1.0m, developed in partnership with HSE and StBG (German safety body)
- Revision to ISO 5006, the earthmoving machinery visibility standard, recently completed and the objectives are well aligned to the requests of the Alliance



Lighting rigs

- The Alliance asks that, where practicable, lights and similar equipment which requires regular cleaning should be designed to allow lowering to the ground.
- Practical solutions may be difficult to achieve
- There is no current requirement in the standards
- There are other safe means of doing this work (cherry-pickers, scaffolding, platforms, etc.)



Seat belt indicators

- The Alliance asks that a visible green light should be fitted which, if lit, would confirm that the seatbelt is being worn
- An indicator that the seatbelt is fastened is possible but would not indicate that if the belt is being worn
- Verification of wearing a seat belt could be complex



In cab noise below 75 dB(A)

- The Alliance asks that operators' exposure to noise does not exceed 5 dB below statutory 1st action level (which is 80 dB)
- The law says that the exposure limit is 87 dB(A), taking account of hearing protection, that employers must ensure that hearing protection is worn at 85 dB(A) and that it is available at 80 dB(A)



Retrofits

- Unless engineered into the machine by the manufacturer there can be safety and maintenance issues
- It takes a long time to develop a well-engineered solution that considers all the new safety risks
- Work started some years ago and solutions are starting to be available
- The amended standard will reflect the experience gained by manufacturers during this process



Industry comments

- Many of the requests relate to access/egress to the normal operating position and for frequent maintenance and cleaning
- Such requirements described in ISO 2867 Access System Standard
- Some of the requests have already been identified by industry and included in the revision that is soon to be published

Action

- ISO Technical Committee for earthmoving machine standards, ISO/TC127, to immediately start a new project to update the ISO 2867 Access System standard
- Amendment will add machine-specific performance criteria for access systems
- Will consider areas where access is needed as well as the constraints
- Will also cover servicing and repair of machines



ISO 2867 – issues to be addressed

- 1. Access systems from the ground to the cab or daily maintenance platforms, taking into account machine access needs and machine or application constraints.
- 2. Ergonomics performance criteria for access platforms, specifically for guardrails or other means to address falls, taking into account machine and application constraints.



ISO 2867 – issues to be addressed

- 3. Performance criteria for other types of access systems that do not use ladders or stairs, such as moveable platforms to raise the operator or service person to the work area.
- 4. Performance criteria for access systems for machine servicing and repairs.



Timetable

- A first Working Group meeting to prepare an amendment to ISO 2867 will be scheduled for 12/13 September 2006 in the UK
- ISO timescales suggest revised standard could be available in 36 months
- but this could be achieved earlier



Participation

- Expert input from the quarry industry is needed to address the Atlantic Alliance concerns about access systems on earthmoving machines
- Participation is through the national standards bodies in each country



Summary

- Machine design is improving all the time
- ... and will continue to improve.
- Use the pool of knowledge and experience to develop the necessary standards.
- Proper use and maintenance of the machine.
- Important to buy and use legitimately CEmarked equipment.
- Good accident data is essential to establish the root cause of accidents and the solutions.



THE END

For more information about the CEA and our work on behalf of the UK Construction Equipment industry, please visit

www.coneq.org.uk

