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COCA Update on WorkSafeBC Activities #555 July 17, 2013

WorkSafeBC Requests Input on Guideline

WorkSafeBC has asked COCA for input on the enclosed Draft guideline for Elevating Work Platform Operator Training Requirements -- G13 2(1)-3 - Draft Guideline for Review.

There is no new Regulation or practice within the Draft. It is a consolidation of existing requirements.

Note that the "qualified individual" is already defined by WorkSafeBC Regulation as someone who is qualified by virtue of training, education or experience.

Please send any comments you wish to make to Grant McMillan at the email address above.

G13.2 (1)-3 Training requirements for operators of elevating work platforms

Preliminary Issue XXXX

Regulatory excerpt

Section 13.2(1) of the *OHS Regulation* (“*Regulation*”) states:

- (1) A ladder, window cleaner's belt or work platform must meet and be used in accordance with
 - (a) the applicable CSA or ANSI standard in effect when the equipment or structure was manufactured, except as otherwise determined by the Board,
 - (b) another standard acceptable to the Board, or
 - (c) if there is no applicable standard under paragraphs (a) or (b), the requirements of a professional engineer.

Purpose of guideline

The purpose of this guideline is to clarify the training requirements for operators of elevating work platforms.

Applicable standards

Section 13.2 of the *Regulation* requires that elevating work platforms must be used in accordance with the applicable standards. These standards provide information applicable to the training and retraining of the operators of this equipment, and list the topics that must be covered during the training. The following are some of the standards that include requirements for training operators of elevating work platforms:

- *CSA B354.1* *Portable Elevating Work Platforms*
- *CSA B354.2* *Self-propelled Elevating Work Platforms*
- *CSA B354.4* *Boom-type Elevating Work Platforms*
- *ANSI/SIA A92.2* *Vehicle-Mounted Elevating and Rotating Aerial Devices*
- *ANSI/SIA A92.3* *Manually Propelled Elevating Work Platforms*
- *ANSI/SIA A92.5* *Boom-Supported Elevating Work Platforms*
- *ANSI/SIA A92.6* *Self-Propelled Elevating Work Platforms*

Trainer qualifications

The CSA and ANSI standards referenced in the *Regulation* also set out the qualifications for the trainer. Persons providing the training must be qualified in accordance with the requirements of the standard that the particular elevating work platform being operated has been manufactured to. Elevating work platforms may also be manufactured to meet more than one standard, such as both the applicable CSA and ANSI standards.

The employer may choose to have the operator training provided by a training agency, a qualified person working for the employer, or by some other qualified individual.

Proof of Training

The standards either require or recommend that upon successful completion of the training, the training provider issues the operator with a document that indicates proof of the training received. Generally, the standards require that the following information is provided:

- The name of the person trained
- The date the training took place
- The name of the organization or entity that provided the training
- The name of the trainer(s) that delivered the training
- The specific type of elevating work platform covered by the training (e.g. scissor lift, boom-supported elevating work platform, etc.)
- The applicable standard under which the program of training was provided

The requirement for the retention of proof of training and retraining documents vary, depending on the applicable standard. In general, CSA standards require that the operator keep the proof of training document with them at all times while operating the equipment, where ANSI standards typically require the employer to retain training and retraining records for a period of at least four years, but place no obligation on the operator to keep the proof of training documents with them while operating the equipment.

Retraining and Upgrade Training

The applicable standards do not require that retraining be conducted at a specific interval. Rather, the employer is required to provide retraining to the operator based upon their observations and evaluation of the operator's competency. Where deficiencies are identified, the employer must arrange to provide retraining that addresses the specific operational deficiencies that were identified.

Employers may wish to provide operator retraining on a regular fixed interval. Employers have a duty under section 115(2)(e) of the *Workers Compensation Act* to provide to their workers the information, instruction, training, and supervision necessary to ensure the health and safety of those workers in carrying out their work and to ensure the health and safety of other workers at the workplace. Provided that any operational deficiencies that are identified in the period between the established formal retraining intervals are addressed appropriately, and employers comply with the above requirement, they may determine the frequency of any retraining program they wish to implement.

Where an operator is required to operate an elevating work platform that they are not familiar with, the employer must provide the operator with adequate upgrade training to ensure that they can demonstrate proficiency in the operation of the particular elevating work platform. Operators must receive upgrade training when any of the following circumstances arise:

- New equipment is introduced in the workplace that is unfamiliar to the operator
- The equipment is modified in a manner that affects its safe operation or load capacity
- The operating conditions or the environment in which the operator works has changed
- The operator has been involved in an incident relating to the equipment
- Skill or knowledge deficiencies have been identified
- The requirements of the applicable standards or the *Regulation* change

Retraining or upgrade training may be provided by a training agency, a qualified person working for the employer, or by some other qualified individual, depending on the individual learning needs of the operator at that time.

Ensuring Compliance

Employers must adhere to the requirements specified in the standard that apply to the particular equipment they are using. Since the individual elements of the various standards differ in areas such as operator training, retraining, the proof of training provided and the retention of records, this can present a challenge with respect to ensuring compliance on an ongoing basis.

To ensure compliance, employers are encouraged to review the training related elements of the various standards that apply to the elevating work platforms they use, and consider adopting the most stringent elements of the standards that apply to that type of equipment. For example, ensuring that all operators possess a suitable proof of training document, and keep that document with them at all times while operating the equipment.

Employers have a duty under section 115(2)(e) of the *Workers Compensation Act* to provide to their workers the information, instruction, training, and supervision necessary to ensure the health and safety of those workers in carrying out their work and to ensure the health and safety of other workers at the workplace.

Employers also have a duty under sections 3.23 and 3.24 of the *Regulation* to ensure that new workers are given health and safety orientation and training specific to that workplace. As defined in section 3.22, a new worker is any worker who is new to the workplace, returning to a workplace where the hazards have changed, affected by a change in the workplace hazards, or relocated to a new workplace if the hazards are different.

In addition, there must be compliance with the applicable mobile equipment requirements set out in Part 16 of the *Regulation*.