



**International Powered
Access Federation**

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Dear Miss Butler

I thank you for your letter dated 15th July 2024 and appreciate the thorough review and recommendations provided.

The International Powered Access Federation's (IPAF) objectives are to promote and enable the safe and effective use of powered access equipment worldwide through providing technical advice and information, influencing and interpreting legislation and standards, and through its global safety initiatives and training programmes. IPAF is a not-for-profit organisation owned by its members, which include manufacturers, rental companies, distributors, contractors, and users. IPAF members operate a majority of the MEWP (Mobile Elevated Work Platforms) rental fleet worldwide and manufacture about 85% of platforms on the market.

MEWPs are among the safest methods for temporary work at height, and while efforts are focused on avoiding major injuries and fatalities, IPAF believes that these risks can be mitigated through proper training, adequate supervision, thorough planning, comprehensive risk assessment, and effective rescue planning.

IPAF's objective is to reduce the number of accidents in the industry and enhance overall safety. IPAF members are deeply committed to promoting and supporting safety initiatives within the industry.

IPAF members pushed for the introduction of the IPAF accident reporting portal which provides industry insights into incidents and accidents over the past decade. It was created because of a lack of aggregated and consistent information from other sources. This portal enables IPAF to produce its annual [Global Safety Report](#). The report focuses on the six main causes of serious and fatal incidents relating to Mobile Elevating Work Platforms (MEWPs).

In addition to the global safety report, IPAF launches a safety campaign each year based on the primary causes of fatal and major incidents reported to IPAF. For example, preventing and reducing falls from MEWPs, avoiding electrocutions and the 2024 campaign focuses on MEWP entrapment: <https://www.ipaf.org/en-gb/campaigns>



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GOVERNANCE AND COMMITTEES

IPAF's governing body is the IPAF Council, composed of the IPAF Board members, Committee Chairpersons, Country/Regional Council chairpersons, and five directly elected members. Council members are elected for a two-year period by IPAF members.

In addition, IPAF also convenes a number of committees from within its member base:

IPAF Training Committee

The IPAF Training Committee is the custodian of IPAF's training programme and meets quarterly to review issues related to course content, training material and training centre requirements.

IPAF International Safety Committee (ISC)

The International Safety Committee (ISC) was created by IPAF to assist in globalising standards development, effective implementation, and promoting awareness of industry safe practices.

IPAF Manufacturers' Technical Committee (MTC)

The IPAF MTC focuses on technical and safety matters relating to platform design and manufacture. It monitors and informs on changing legislation and technical standards, and lobbies on matters of relevance to manufacturers.

IPAF working with other associations

Additionally, IPAF represents the industry in various associations, including the APPG (All Party Parliamentary Group) on Falls from Height, and other associations such as the AIF (Access Industry Forum), PSG (Plant Safety Group), which completed its second review of "[Guidance on reducing trapping/crushing injuries to people in the MEWP platform](#)" in January 2023.

A full list of its technical guidance can be found with this link: <https://www.cpa.uk.net/safety-and-technical-publications/plant-safety-group>

IPAF produces a wealth of free industry resources, including detailed guidance documents, safety posters, short videos, and toolbox talks, based on accident data:

- [MEWP Rescue Procedures Toolbox Talk- Overhead Obstructions Safety Short](#)

IPAF MEWP OPERATOR TRAINING

IPAF does not set the syllabus for the whole industry. IPAF's training course meets the requirements of ISO 18878:2013 Mobile Elevating Work Platforms — Operator (Driver) training. The training is developed by industry experts and staff at IPAF. The IPAF course is one of a number of MEWP operator courses available in the UK. The ability to deliver the IPAF training programme for platform operators, certified by Bureau Veritas as conforming to ISO 18878 is a benefit of IPAF membership.

In the UK there are approximately 184 IPAF approved training centres and over 520 IPAF Instructors. Globally more than 200,000 operators are trained each year through a worldwide network of IPAF-approved training providers. Successful trainees are awarded the PAL Card (Powered Access Licence), the most widely held and recognised proof of quality-assured training for platform operators. In the UK the licence is valid for five years.

The IPAF PAL training course is a 1–3-day course depending on the delegate's experience, it focuses on the basic theory of MEWPs, followed by practical training and testing. The course provides the MEWP operator with basic training only.

MEWP Operators who pass the practical tests are provided with a logbook (now in the form of a digital logbook through the ePAL app) which allows them to log familiarisation and their MEWP experience, building their experience over time.

The IPAF Operator course syllabus covers:

- Regulations and guidance



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- MEWPs
- Structural parts
- Familiarisation and pre-use inspection
- Platform movements and travel
- Ground conditions
- Hazard awareness
- Operation

The rescue hierarchy which is well recognised in the industry and contained within British Standards is:

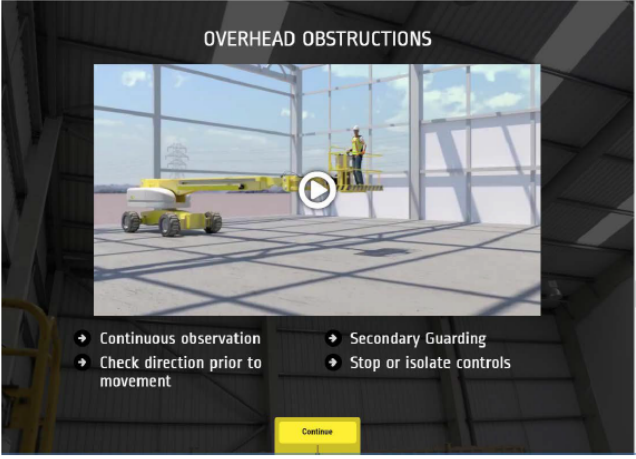
1. Self-rescue
2. Ground rescue
3. Service engineer/technician
4. Mid-air / platform to platform
5. Emergency services

During the course, each delegate is required to demonstrate the ability to use both ground and platform auxiliary/rescue controls to safely lower the platform to the ground.

In the final Operation section of the course, the candidates discuss the requirement to have a rescue plan. This is a learning exercise where trainees are asked what they feel are the steps necessary to rescue. The relevant aspects of when and how you would enact a rescue are then presented to them in theory. One of the stages within the hierarchy of rescue is that of mid-air rescue – often referred to as Platform-to-Platform rescue.

Also, within the Operation section there is a video which depicts a MEWP travelling in a rearward direction, where the operator fails to look in the direction of travel, leading to an impact that causes entrapment, this emphasises the need and requirement for a rescue plan and having a nominated ground rescue person present.

Slide 9.11.0



Notes

This video has no audio. The instructor can explain how to correctly handle work near overhead obstructions based on the information below.

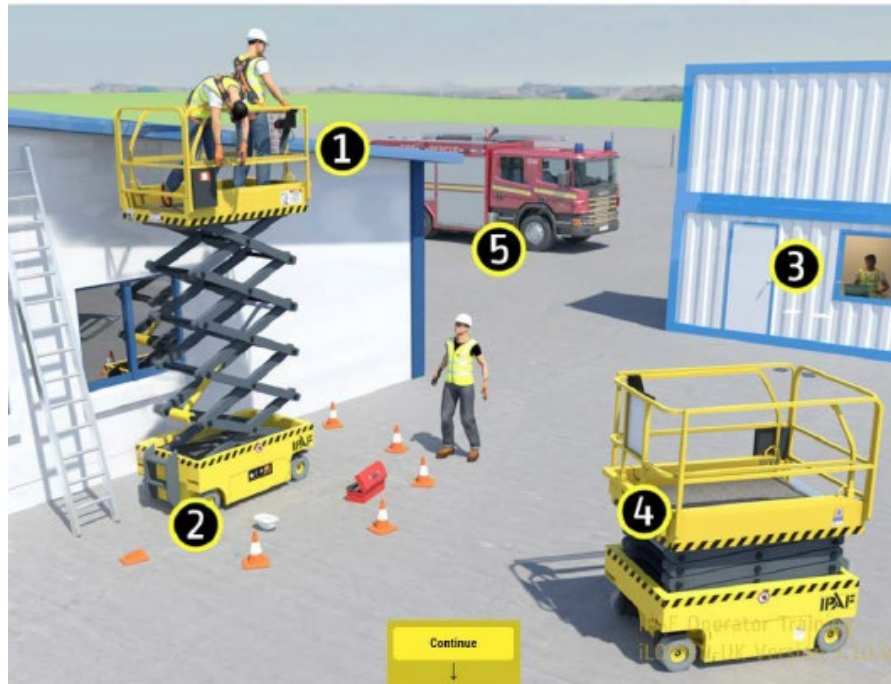
Continuous all-round observation is essential. Always visually check before moving in any direction.

Keep all body parts inside platform guardrail. Do not leave the control station until the machine comes to a complete stop at ground or desired work area. Shut the machine down to isolate the controls and prevent unintentional movement or operation.

Some MEWPs can be fitted with secondary guarding devices to minimise injury from **entrapment**. Information on secondary guarding devices which can assist the operator when operating near overhead obstructions can be downloaded at the end of the course.



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OTHER TRAINING OFFERED BY IPAF

In addition to the operator training as detailed above IPAF offers a number of training courses for differing roles and levels of experience and knowledge.

IPAF PAL+ MEWP Operator Training

IPAF PAL+ is an optional, additional one day of category-specific advanced training qualification aimed at operators working in higher risk or challenging environments.

IPAF MEWPs for Managers

Aimed at those who plan, supervise, or manage work at height activities with MEWPs. This course covers what managers need to know for safe and effective use of MEWPs on site, including planning, conducting a risk assessment, selecting the right equipment for optimum cost-efficiency, mitigating all possible risks and preparation of a rescue plan.

MEWP RESCUE

It is the User's responsibility to provide and prepare a rescue plan, as documented in various legislation, i.e., Work at Height Regulations, Management of Health & Safety at Work Regulations, Construction Design and Management Regulations, and the Health and Safety at Work Act.

User is defined in BS8460:2017 Code of practice for the safe use of MEWPs as a:

person or organization that has control of the planning, management, and use of the MEWP on site and is responsible for the MEWP to be kept in a safe working condition

1. *NOTE 1 This can include the person responsible for the site, principal contractor, or subcontractor.*
2. *NOTE 2 This is not necessarily the same as the operator*

IPAF and its members' position has always been that IPAF's role is not to provide training for platform-to-platform rescue as it is crucial that the User of the MEWP has put their own rescue plan in place which will be unique to their circumstances on the day. Rescue can differ significantly depending on the task, the environment, the types of MEWPs being used and the level of experience of the MEWP operator(s) and rescuer(s). The importance of the rescue plan is stressed in all of IPAF's training courses and guidance documents.

MEWP operator training cannot and should not try to duplicate this, because importantly, it is impractical and inappropriate to provide specialist training such as "platform to platform" rescue within the more general and basic IPAF PAL Card training syllabus.

IPAF, however, fully takes on board the consequences of this incident and the findings of the coroner and as such understands the urgency to review its current position.

Proposal in response to the coroners' findings

In light of this incident IPAF proposes to bring this matter to the industry through its elected members at its board and council meeting to consider its current position on rescue plans. The next IPAF Council meeting will be held on 10th September 2024, and I will table the subject of Rescue from MEWPs including Platform-to-Platform with the members present.

My recommendations to discuss with the IPAF Council will include:

Forming an industry working group to discuss platform-to-platform rescue, including the following options:

1. Developing a separate practical based 'module' on platform-to-platform rescue
2. Producing specific guidance on platform-to-platform rescue and platform to ground rescue,
3. Preparing an enhanced pictorial toolbox talk
4. Creating a platform-to-platform safety video

From experience, work groups of this type will take at least 6-9 months to prepare and produce the necessary presentation, examinations etc.



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INDUSTRY RESOURCES – PREPARED OR SUPPORTED BY IPAF

- [Guidance on Emergency Rescue](#)
- [MEWP Rescue Procedures Toolbox Talk](#)
- [MEWP Rescue Plan Toolbox Talk](#)
- [CPA Plant Safety Group Publications](#)

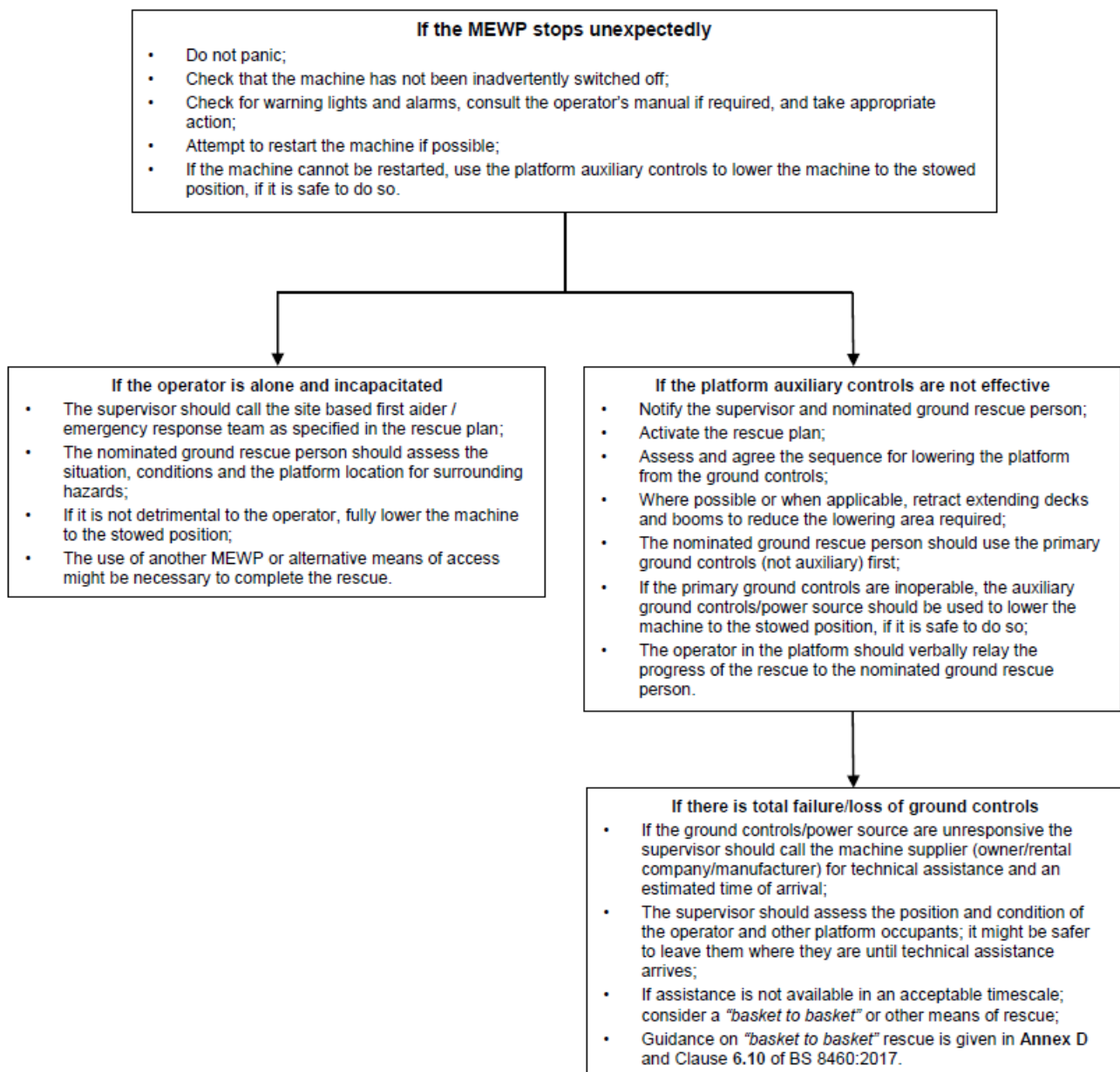
IPAF has been involved in creating and updating various documents, including Annex D of the CPA's "Rescue of persons from MEWPs, and the British Standard BS8460:2017 – Code of practice for the safe use of MEWP which has information contained in Annex G (Informative) for an example of a rescue plan.

For context in Annex B – BS8460:2017 Code of practice for the safe use of MEWPs shows the following with regards to a hierarchy for rescue from MEWPs.



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Annex B - Rescue from MEWPs Hierarchy



Yours faithfully,



Head of Safety and Technical