

TECHNICAL BULLETIN 07 FORK LIFT TRUCK SAFETY FITTING OF LIGHTS, FLASHING BEACONS, REVERSING ALARMS AND MIRRORS

Reason For This Bulletin

There is some confusion about the legal requirements to fit safety items such as lights, flashing beacons, reversing alarms and mirrors to Fork Lift Trucks in use. In general these items can improve safety. However they can, in some circumstances, increase the danger to operators and other employees or produce environmental hazards that outweigh potential safety benefits. It is therefore important to understand the legal limitations and the significance of Risk Assessment when considering the use of such items.

Aim

The aim of this bulletin is to provide members of the Fork Lift Truck Association with clear guidance on when to fit lights, flashing beacons, reversing alarms and mirrors to fork lift trucks.

Legislation

The specific paragraphs of legislation are explained under the section for each item of equipment detailed below. The two main items of legislation are:

Provision and Use of Work Equipment Regulations 1998 – PUWER 98

(Extracts quoted in this bulletin are taken from the Approved Code of Practice And Guidance. Paragraph numbers are shown where appropriate.)

The Road Vehicles Lighting Regulations 1989 – RVLR

With a few exceptions there is no legal requirement to fit any of the items listed above. Where there is a legal requirement this will be made clear.

Safe Operations

In stressing the fact that there are no absolute legal requirements for the fitting of these items the Fork Lift Truck Association does not support a negative attitude to the safety benefits that are often gained from the use of such equipment. However, nor does it support the blind adoption of such systems when the fitting may be detrimental to safety or where there are cost implications that cannot be justified. Safe operations should always be the over-riding factor and this will be the subject of Risk Assessment.

Risk Assessment

Risk Assessment must always be site specific. It should also be task specific, although for multi-tasked equipment priorities may need to be established. The user of the equipment (i.e. the employer of the operator) is responsible for such risk assessments. The fork lift truck supplier should be able to provide sound advice and ensure that the equipment provided meets the requirements of the user. Such advice may be provided as part of a site survey.

Maintenance of Equipment

Where any of the items covered by this bulletin are fitted to a fork lift truck then they should be in good condition and operational. Where appropriate, on/off switches should also be operational.

Thorough Examination

The items covered by this bulletin are classed as safety devices and they should be included in the scope of Thorough Examination for the truck.

Retrospective Fitting

The remainder of this bulletin concerns the retrospective fitting of these items.

Lights

There is no absolute requirement to fit lights to a fork lift truck.

PUWER 98 – Regulation 28(f). This Regulation concerns equipping mobile work equipment with lighting for use in the dark. It states:

Every employer shall ensure that, where self-propelled work equipment may, while in motion, involve risk to the safety of persons – (f) if provided for use at night or in dark places –

- (i) it is equipped with lighting appropriate to the work to be carried out; and*
- (ii) is otherwise sufficiently safe for such use.*

371 In terms of this Regulation ‘dark’ means any situation where the light levels are not good enough for the driver to operate the self-propelled work equipment safely without risks to themselves or other people in the vicinity.

372 In such situations the equipment needs to be equipped with ‘appropriate’ lighting. The level of lighting required will depend on the type of equipment being operated, how it is being operated and the area in which it is operating. Factors you will need to consider are the presence of other people and/or obstacles in the vicinity of the equipment and ground conditions which could lead to risk. In

situations where there is a significant risk of an accident, the lighting will need to be at a sufficient level to help control this risk.

373 Regulation 28(f) only covers lighting on mobile work equipment. Lighting provided at the workplace for the use of all work equipment is covered by Regulation 21.

It is clear from the above that the fitting of lighting is a matter for Risk Assessment. The Regulation gives clear guidance on what factors should be considered. In some circumstances, improving lighting at the workplace may be a better option than fitting lights to individual items of equipment.

Lights For Use On A Public Road. If a fork lift truck is only used on a public road between sunrise and sunset and is not fitted with any front or rear position lamp then under Regulation 4(3) of RVLRL the vehicle is exempt from having to be fitted with **any** lamp or reflector. This exemption does not apply to fork lift trucks being used on a public road during the hours of darkness – between sunset and sunrise. Under these circumstances lamps will be required. Full details are given in FLTA Technical Bulletin 03 – Requirements For The Use Of Fork Lift Trucks On A Public Road.

Flashing Beacons

There is no absolute requirement for a Flashing Beacon to be fitted to a fork lift truck.

PUWER 98 – Regulation 24. This Regulation concerns warnings. It states:

Every employer shall ensure that work equipment incorporates any warnings or warning devices which are appropriate for reasons of health and safety.

313 Warnings must be easily perceived and understood, and unambiguous. It is important to consider factors which effect people's perception of such devices, especially for warnings of imminent danger.

Under general circumstances the fitting of Flashing Beacons will be a matter for Risk Assessment. Circumstances under which such fitting may not improve safety will be few and far between. The benefits may be limited in certain bright light applications or in areas where there are vehicles moving together with their beacons operating.

It should be possible to turn off Flashing Beacons for environmental considerations.

When Flashing Beacons Must Be Used. There are a few circumstances when there is a legal requirement for Flashing Beacons to be fitted and used. They are required:

On man-up, very narrow aisle (VNA) equipment.

On any type of truck if it is being driven on a dual carriageway.

On any truck that is engaged in road works, including whilst it is parked.

Reversing Alarms

There is no absolute requirement for Reversing Alarms to be fitted to fork lift trucks.

PUWER 98 – Regulation 24. This Regulation concerns warnings. It states:

Every employer shall ensure that work equipment incorporates any warnings or warning devices which are appropriate for reasons of health and safety.

313 Warnings must be easily perceived and understood, and unambiguous. It is important to consider factors which effect people's perception of such devices, especially for warnings of imminent danger.....The sound given by an audible signal should be of such a type that people unambiguously perceive it as a warning. This means that it must be possible to distinguish between the warnings given by separate warning devices and between the warnings and any other, unrelated, signals which may be in operation at the time. It may not be possible to rely on audible signals in a noisy environment, nor in circumstances where many such signals are expected to be active at one time.

Under all circumstances the fitting of Reversing Alarms will be a matter for Risk Assessment. The above paragraph indicates circumstances when such alarms may not be appropriate. The proximity of neighbours will also have to be considered as such alarms may be perceived as unwanted noise pollution. (There are alarms available that may have a reduced impact away from the immediate vicinity of the truck.)

Where there is a need It should be possible to turn off Reversing Alarms for environmental considerations.

Mirrors

There is no absolute requirement for mirrors to be fitted to a fork lift truck.

PUWER 98 – Regulation 28(e). This Regulation concerns equipping mobile work equipment with devices to improve the driver's field of vision. It states:

Every employer shall ensure that, where self-propelled work equipment may, while in motion, involve risk to the safety of persons – (e) where the driver's direct field of vision is inadequate to ensure safety, there are adequate devices for improving his vision so far as is reasonably practicable.

369 This regulation applies when mobile work equipment is about to move or while it is travelling (including manoeuvring). Under these circumstances, where the driver's direct field of vision is inadequate to ensure safety, then visibility aids or other suitable devices should be provided so far as is reasonably practicable. Regulation 17 requires that operators of mobile equipment should be able to see anyone who may be put at risk when any control is operated. Therefore, if direct vision is impaired, then mirrors or more sophisticated visual or sensing facilities may be necessary. Regulation 28(e) requires, so far as is reasonably practicable, mobile work equipment to have adequate devices to improve the driver's field of vision

where this is otherwise inadequate. Such devices may include mirrors or closed-circuit television (CCTV) and the provision of these devices can be used to meet the requirements of both regulations.

370 Examples of devices which can aid the drivers vision include:

- (a) plane, angled and curved mirrors;*
- (b) Fresnel lenses;*
- (c) radar; and*
- (d) CCTV systems.*

The selection of these devices for use on mobile work equipment is a matter for Risk Assessment, taking account of the purposes for which the devices are provided and their ability to improve driver visibility.

The fitting of mirrors is a matter for Risk Assessment. It is recommended that mirrors are always fitted on trucks that will operate with other traffic, either on factory circuits or public roads.

Some fork lift trucks, such as those with high level cabs, or with high counterbalance weights, will not meet the requirements of the visibility standard. They are required to be fitted with rear view mirrors and where necessary drawbar view mirrors.

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