



# FEM

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Product Group /  
**MEWP**  
**mobile elevating work platforms**



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**Guideline /**  
Mobile Elevating Work Platform  
Information & suitability for the task of  
exiting and/or re-entering at height

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## 0. Scope

This document deals with criteria for the selection of a Mobile Elevating Work Platform (MEWP) for tasks which require exiting and/or re-entering at height (getting on and off the work platform at changing levels) and intends to give guidance on conditions for consideration for this purpose. Exiting and/or re-entering at height is not considered by the standard EN 280<sup>1</sup> as intended use for MEWPs.

This document is primarily addressed to MEWP users who intend using a MEWP for exiting and/or re-entering at height.

The document is addressed also to MEWP manufacturers, to provide them with useful information to help in applying the Machinery Directive 2006/42/EC (or Supply of Machinery (Safety) Regulations 2008 in the UK).

All the following references to EU Regulations are intended to apply also to UK Regulations.

## 1. Selection of a MEWP as Work Equipment

Only equipment compliant with the relevant EU regulations and national legislations, as applicable, shall be used at a workplace. As far as EU regulations are concerned, a MEWP is work equipment, and, as such, its selection and making available to workers is required to comply with the Use of Work Equipment Directive 2009/104/EC.

When considering the use of a MEWP as work equipment provided for temporary work at a height, the user should select a MEWP marked according to the Regulations in place where the product is put into service and use it as intended by the MEWP manufacturer.

Users are not exempt from other obligations e.g. to “pay attention to the specific working conditions and characteristics and to the hazards which exist in the undertaking or establishment, in particular at the workplace, for the safety and health of the workers, and any additional hazards posed by the use of the work equipment in question” (2009/104/EC, Art. 3, paragraph 1).

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<sup>1</sup> EN 280:2013+A1:2015 Mobile elevating work platforms - Design calculations - Stability criteria - Construction - Safety - Examinations and tests

## 2. Conformity of the MEWP

MEWPs must comply with the Machinery Directive, as transposed into national law.

For MEWPs, harmonized standard EN 280 has been issued by CEN on mandate of the European Commission. This standard addresses the Essential Health and Safety Requirements (EHSRs) as required by the Machinery Directive. Therefore, a MEWP manufactured in compliance with EN 280 acquires the legal presumption of conformity to the Machinery Directive only for those relevant EHSRs addressed in the standard as detailed in Annex ZA of EN 280.

EN 280 does not cover the hazards arising from getting on and off the work platform at changing levels (referred to as "exiting and/or re-entering at height") since this is explicitly excluded from the scope (see EN 280, clause 1.2).

A MEWP suitable for exiting and/or re-entering at height must comply with additional safety requirements, not specifically covered in EN 280, but have been identified and applied by the MEWP manufacturer. The Machinery Directive, as part of the drafting of the Declaration of Conformity, allows that, if the manufacturer has applied additional technical specifications, these are made known through the Declaration of Conformity<sup>2</sup>. In addition, a reference in the Declaration of Conformity to the notified body that carried out the EC type examination is a mandatory requirement for MEWPs declared suitable for exiting and/or re-entering at height.

If exiting and/or re-entering at height is part of the intended use of a particular MEWP, as specified by the manufacturer, it shall be EC-type approved by a Notified Body as this particular MEWP has been classified by the Machinery Directive as an Annex IV machine for which there is no harmonized standard covering all relevant EHSRs.

It should be documented that a MEWP that has been EC-type approved, is not always intended for exiting and/or re-entering at height. Only the manufacturer's description of its intended use is relevant.

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<sup>2</sup> Machinery Directive, Annex II, 1. A., third paragraph, item no. 8.

### 3. How to determine what information related to the intended use of the MEWP is available

Documentation that accompanies the MEWP shall include information to help the user plan the activity and determine that the correct MEWP has been selected.

To contribute to MEWP selection, a non-exhaustive list of the information that may be considered is proposed in Annex I.

In the information for use supplied with a particular MEWP (operator's manual, instructions), the manufacturer describes the intended use of the machine and provides the other information required in Annex I EHSR 1.7.4 to the Machinery Directive, which is mandatory. Information provided with the MEWP is an effective communication tool between the manufacturer and the user.

The information on intended use of the MEWPS helps the user to confirm if the MEWP has been placed on the market with consideration of exiting and/or re-entering at height. In case of doubts, the user is strongly encouraged to contact the manufacturer.

### 4. The workplace and safety procedures

The identification of a MEWP suitable for the work to be carried out is one of the provisions relating to safety in the workplace.

It is the user's responsibility to implement safety measures which can reduce risks to persons or work equipment present at the workplace. Annex 2 is a non-exhaustive list of examples of risks that are a user's responsibility to assess for safe exiting and/or re-entering at height.

## Annex 1 - Non-exhaustive list of information that a user should consider for exiting and/or re-entering at height from a MEWP

Once the user has determined the use of a MEWP is the safest and most effective mean of access, the user should then select a MEWP that is appropriate for exiting and/or re-entering at height as described in the information provided by the manufacturer. Below is the type of information to consider (non-exhaustive list):

- information on the access point to the platform must be provided to allow the operation of exiting/re-entering without exposing the worker to the risks of falling;
- information about anchorages on the MEWP platform and structure suitable for the connection of Personal Fall Protection Equipment (PFPE) for the purpose of entering/exiting at height;
- PFPE connection procedures when entering/exiting at height (dual lanyards, where to connect, sequence to connect and disconnect, etc.)
- information related to additional loads or modification of the loads imposed on the MEWP for which it was not designed, which could compromise the stability or overload the MEWP;
- warnings on the potential oscillation of the platform during exiting/re-entering and/or sudden unloading of materials.
- Information about any specific limitations associated with exiting and/or re-entering at height (e.g. use of gates and not over or through rails, wind speed limitations, etc.).

## Annex 2 - Indicative list of user evaluations

If the user foresees the need of exiting and/or re-entering at height from the MEWP, they should analyse and assess the risks related to the specific workplace and how they affect the work method statement, before carrying out such operation.

In addition to regular assessments, the following are some (non-exhaustive) examples of the assessments that a user should consider for exiting and/or re-entering at height purposes:

- a) Confirm that the use of a MEWP and exiting and/or re-entering at height is the safest and most effective mean to accomplish the given task and that the selected equipment provides adequate levels of safety;

Pay particular attention to the following risks:

- i. falling from height
    - from the platform
    - from the landing area
    - due to tripping hazard caused by foot rails or by different heights due to deflection;
  - ii. MEWP mechanical failure due to overload of the platform including dynamic effects from changing the load in the platform;
  - iii. overturning due to overload of the platform including dynamic effects from changing the platform load;
  - iv. collision between parts of the MEWP and of any surrounding structure, especially the landing area, due to the deflection of the MEWP structure;
  - v. crushing due to movements between the MEWP and any surrounding objects due to environmental conditions, e.g. wind;
- b) assessment of the landing area (strength, size, capacity, etc.);
  - c) assessment of the availability of anchorage points for PFPE);
  - d) appropriate choice of PFPE
  - e) method of transition for the operator/worker to achieve 100% tie-off from the platform of the MEWP to the approved work structure that incorporates other approved fall protection measures (exit, uncoupling, re-hooking etc.);
  - f) verification that the maximum platform load capacity of the MEWP, as indicated by the manufacturer, is suitable for the intended use during exiting and/or re-entering at height;

- g) awareness of and planning for potential vertical and horizontal platform movement while exiting or entering an elevated MEWP, also possible interference with other lifting equipment and / or structures adjacent to the landing area;
- h) emergency/rescue plan management;
- i) assessment of all environmental factors (e.g. ground conditions, wind, rain, snow, ice).

The recommendations and advice contained in this Guidance Note are based on specifications, procedures and other information that have been collected from the FEM from its members. They represent what is, as far as FEM is aware, the best available data at the time of publication on the instruction and use of the equipment concerned in the general conditions described and are intended to provide guidance for such use.

The suitability of this Guidance Note must be determined by the judgement of the person applying it in accordance with the conditions in which use is envisaged and subject to all relevant statutory requirements.

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