



Memorandum

To : Members ECOL Expert Committee
Subject : MRA development / Lessons learned / proposals for improvement
(discussion document for ECOL EC meeting 3)
Sender : Workgroup Chairman - Ton Klijn
Date : Tuesday, 12 May 2020

Dear Members of the ECOL Workgroup and Expert board,

As you are aware, we have been working on a number of subjects to further improve the ECOL system based on experience and requests from participants. We have given these subjects some thought and have tried to come up with some ideas on how to make the improvements needed and tackle some of the deficiencies we noted, which are explained in this memorandum.

We will put these topics on the agenda of our upcoming Expert Committee meeting where you can vote on the adaptations proposed based on the content of this memo.

A) Mutual Recognition agreement with BC Crane Safety (British Columbia – Canada)

- We have been discussing the drafting of an MRA with BCACS for quite some time now – as you will recall the sad passing away of Mr Gunnar Mardon has delayed this process for a substantial period of time.
In recent months however we have revived discussions and have meanwhile completed a Validation matrix Generic training design and a Comparison of Learning outcomes. Both documents you will find attached to this memo for your reference.
- In my opinion the remainder of remarks is largely due to required local differences (such as pt. 2.2.11- the CE standard being replaced by the (Canadian) CSA standard) and can be accepted as equal or similar to the ECOL required level.
- However, one point of difference between the ECOL and BCACVS schemes remains that I think requires a decision from the Expert Committee: It concerns pt. 9.3 of the Generic training design: 'the amount of pupils during practical training'
We have received an explanatory note from an ITA training institute on this matter, outlining how practical training is conducted at present. This explanation is inserted as appendix A in the Generic Training Design Validation document.
In my opinion a decision of the Expert Committee on the acceptance of this training practice is required, so this topic will be added to the E-Ballot form.
- If your Committee decides positively to the acceptance of the Generic Training design and Learning Outcomes comparisons we will proceed to prepare an MRA with BCACS.



B) RPL procedure (Recognition of Prior Learning)

- We have had a number of requests for training time reduction based on prior learning by applicants. For a good understanding: this is another situation than the one we have already endorsed when we reduce the training time for experienced operators based on their operating experience. Here it concerns applicants who have not been trained as crane operator, but in affiliated professions such as rigger or lifting supervisor.

The argumentation is different but there is some validity in the argument that a number of diploma's would allow an applicant operator to be trained for a somewhat shorter period; we propose the following text to be accepted for insertion in the training requirements in a new to be created RPL section.

Applicants wishing to take part in the ECOL training can be eligible to get a maximum of 40 hours of training time reduction based on:

- *Being in possession of a 'working at heights'-certificate; National recognised standard, Company standard, GWO-certificate, or a WTG-manufacturers certificate; Based on a country specific national standard reduction will always be granted, otherwise the trainer can make an application. (4 hours).*
- *Being in possession of an industry recognised forklift truck or telehandler operator certificate with minimum training duration of at least 2 days.(4 hours)*
- *Having prior experience in and/or knowledge of the lifting industry. This can be proven by at least one of the following:*
 - *Having at least one year experience as rigging operator (8 hours)*
 - *Being in possession of a recognized rigging certificate. Examples are: (the Dutch AVL, ABVL, BVL, VVLH, TCVT W408, Nogepa 1.9 Banksman or IS-006 certificates, the English Slinger signaller CPCS, Appointed person CPCS, Crane Lift supervisor CPCS, will always be accepted, for other similar certificates a recognition application can be made. (24 hours).*

We have developed an application form for the recognition of previous training (ECOL 3.01b) that you will find attached to this memo. We will add a request for a decision on the above procedure to the E-ballot form.

C) C-class licence and medical fitness

From the outset of the development of the ECOL system we have defined the possession of a C-class licence as a precondition for participation in the ECOL training and examination scheme. The idea behind this was that with this prerequisite we could ensure the applicants had sufficient training abilities to successfully complete the training and were medically fit to act as crane operator. However, recently we have experienced (as a result of an incident during a TCVT examination) that the medical requirements for a C-class driving licence do not entail any requirements for hearing capability. In other words: a deaf candidate will be declared medically fit. This means we could be confronted with a deaf applicant wanting to do the ECOL training and examination.

In my opinion as ECOL foundation we will have to deal with two questions:

- 1) Do we think it is advisable to allow deaf people to operate a crane, or do we think this would cause additional safety risks ECOL seeks to avoid;
- 2) If the answer to question 1 is in favour of allowing deaf operators how will we deal with the examination assignments they cannot fulfil, such as the assignment where we stipulate the use of radio communication for lift direction ?



We will ask the Committee for a decision on the above two questions in the E-Ballot. The advice of the ECOL management in this matter is that we should try to avoid the additional safety risk that occurs by allowing people to operate a crane while they do not have full use of their vision and hearing capabilities. In our opinion this risk occurs both in the operational mode as well as during their participation with the machine in road traffic.

Hence in case of a decision of the Expert Committee in line with our advice we will also propose to the Committee to adapt point 2.2 of the generic training design as follows:

2.2 Medically fit according to truck drivers licence regulations, *and in possession of unimpeded hearing capacity.*

D) New Documentation

As you will appreciate we have been busy adapting all ECOL related documentation in the past period. An overview of all this can be found in the ECOL Document overview that you will find in the secured section of the ECOL website, for which each of you has received an inlog code.

You can view all documentation in the latest version when selecting the user menu at:

<https://ecol-esta.eu/user-menu/>

There are two documents however that I think should be reviewed by the Expert Committee in particular, which are:

- the ECOL Generic Training design vs 11 that has been adapted for RPL and CEFR classification and,
- the Mid-term assessment form (ECOL 2./07) that trainers have to use to assess their applicants.

Both documents are attached to this memo for your reference; you will be asked for your approval by E-ballot.

E) General topics / any other business

Should you have any other topics or concerns that you wish to bring before the Expert Committee before or during the E-Ballot procedure, please let us know by return email so we can address these in the period before the E-Ballot or during the voting if appropriate.

Bergen op Zoom, May 4th 2020,

Ton Klijn

ECOL Management

