

**Submissions to the Legco Subcommittee on Factories and Industrial Undertakings
(Loadshifting Machine) Regulation**

9 September 1999

I am the Chairman of the Central Container Handling Safety Committee (CCHSC). On behalf of the CCHSC, I wish to make the following comments on the F&IU (Loadshifting Machine) Regulation, with particular focus on forklift trucks.

1. Members of the CCHSC support the authority's proposal to introduce a mandatory training and certification system to ensure the competence level of forklift truck operators and to facilitate law enforcement.
2. Paragraph 13 of the Legco Brief states that it is estimated that about 2000 forklift trucks are currently in use in various industrial undertakings and about 2000 workers only are therefore required to be trained. Members of the CCHSC believe that the authority has under-estimated the economic implications the proposed regulation will have on the industry. Based on the information given by members, there should be over 1000 workers either directly or indirectly employed by CCHSC member companies to drive forklift trucks regularly. The estimate provided by one reliable source suggests that there should be around 3500 forklift trucks in use in Hong Kong totally. With a manning ratio of 2 or 2.5 to 1 machine, the total number of potential operators should be in the region of 7000 to 8000.
3. Members of the CCHSC have great concern on the proposed transitional arrangements that must be followed by existing operators in order for them to be legally qualified and awarded certificates. Members consider that the proposed 2-days refresher-training course for existing operators may be too excessive. Members emphasize that they have already made extensive effort training their operators and many of these operators have been operating forklift trucks for a long time with very good safety records. Having these operators re-trained for the purpose of the proposed new regulation seems unfair to the operators and their employers. Members strongly recommend that automatic approval be granted by the authority to those operators who can produce proven in-service records (say for no less than 2 years). Additional evidence (e.g. proper training records) to justify the automatic approval may be considered.
4. Members wish to draw the authority's attention to the following issues/situations:
 - a) Interchangeability between a forklift operator certificate and a front loader operator certificate.
 - b) The need to distinguish a 3-ton forklift truck from a 30-ton forklift truck.
 - c) Situation where a ship's crew driving a forklift truck owned by the ship to load/unload cargo to/from a ship at a container terminal.
 - d) Qualification required to be an authorized training scheme operator.

Members believe that at some stage these issues have to be clarified/addressed by the authority.

5. Members suggest that a thorough consultation be conducted by the authority with the relevant industries to solicit opinions for addressing those practical issues as soon as possible.

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