

Lift SMEs point of view on EU revised “Standardisation Request” to CEN TC 10

February 2022

In November 2021, CEN TC10 - Lifts, escalators and moving walks - received from the European Commission the draft of a “New Standardisation Request” concerning the revision of harmonised standards for lifts.

The previous Standardisation Request was issued in September 2016. The provisional revised standards developed by the TC did not prove to be fully aligned with the indications given in that request. These standards were also not aligned with various suggestions and comments, also by the EC desk officers when being submitted for evaluation by CEN.

The draft of the new standardisation request is consequently welcome by the SMEs in the sector and their representatives. The request better defines in a legally binding document most of the issues that did not seem to be properly addressed during the initial revision work in the standardisation committees.

It is now clearly specifying the objective of all the aspects of many Essential Health and Safety Requirements (EHSRs) of the Lift Directive 2014/33/EC (LD) and of those of the Machinery Directive 2006/42/CE (MD) relevant for lifts.

Moreover, some items that were often overlooked are now clearly highlighted as well. Among others, it is important to fully understand and mention the expected correct implementation of EHSR 1.1.2. of the Machinery Directive (Principles of safety integration) and EHSRs 1.6.1 – 1.6.2 – 4.4 – 4.5 – 6.1 – 6.2 of the Lift Directive, all of which, as can be inferred, are crucial for the smooth running of the sector. .

In particular the request highlights the need to improve the following aspects for all standards:

- The provisions for the “foreseeable misuse” of the lift, in addition to its “intended use”, as indicated in EHSR 1.1.2. of the Machinery Directive. It is evident that the “foreseeable misuse” is, too often, completely ignored. This could cause harm, damage or other consequences that should have been adequately addressed and prevented by appropriate additional provisions or dedicated features.
- The provision of a complete set of instructions for the correct operation of the lift for its whole life-cycle, as indicated in EHSRs 6.1 & 6.2 of Lift Directive. To provide all the details for the “periodic checks”, considered necessary by the installers and manufacturers, under their responsibility, in order to guarantee a reliable and efficient set of “planned maintenance interventions”. They have to be clearly specified in a sort of “maintenance masterplan”, considering the effective course of operations of the specific lift: including timely settings, adjustments and also replacement of worn components. The Masterplan, together with the “logbook”, shall remain available at the lift site in a position easily identifiable and accessible to the maintenance and rescue operators.

In addition, for specific standards, further requirements are listed, as follows:

- For “accessibility”, an adequate implementation of the United Nations Convention on the Rights of Persons with Disabilities should be carried out addressing also some of the specific needs of persons with disabilities, and not only be limited to standards EN 81-70 and EN 81-76. It is now requested

that also other standards for lifts (such as EN 81-20; EN 81-21, EN 81-22) shall include provisions covering different aspects of accessibility of lifts based on the “Design-for-All approach”, as indicated in EHSRs 1.6.1 & 1.6.2 of the Lifts Directive (LD). The objective is to ensure barrier-free and easy access and use of lifts to all users, by applying functional requirements that consider the various sensory abilities of users, including those with disabilities, and the way in which persons with different types of disability can interact with the lift.

- For the “two-way means of communication”, it is also required the implementation of the “Design-for-all approach” in the standard EN 81-28. It has to be noted that the application of those functional requirements that take into account various types and levels of sensory abilities would require more sophisticated features for both the device in the lift car and the connected one in the relevant call centre.

The roadmap of this draft standardisation request includes some discussions between the European Commission and CEN for the agreement on the various details, in addition to consultation of other stakeholder organisation such as SBS, in line with EU rules.

Among some of the parties involved, there is the awareness that there may be a strong resistance within CEN to accept some of the above-mentioned issues that are extremely important for lift SMEs, and so have to be fully supported and urgently implemented.

In fact, it is already known in the lift sector that all ~~such~~ above mentioned issues are already fully implemented in other parts of the world, specifically in the North American markets: some of them since very recently, others for over 20 years ago.

The lift sector and its SMEs should be confident that the EU Commission and the CEN representatives, appropriately setting aside corporative interests, manage to find the only acceptable agreement capable to bring our European standards for lifts to the state of the art nowadays recognised in the most developed countries of the world. This would be the only way to confirm the leadership of Europe in the support of “Free Competition” and of “the Citizens’ Rights”, so often mentioned in many other occasions.

SBS and EFESME, working together for many years to protect European SMEs in the lift industry, will continue to follow this topic with interest and attention, in order to be able to intervene in the appropriate and necessary manner, and will keep all readers informed about any further development of this “New Standardisation Request”.

Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

EXCERPT FROM ANNEX I

List of existing standards to be revised and list of draft standards to be completed referred to in Article 1

Table 1. List of existing standards to be revised

Reference information	
1.	EN 81-21 Safety rules for the construction and installation of lifts – Lifts for the transport of persons and goods – Part 21: New passenger and goods passenger lifts in existing building
2.	EN 81-22 Safety rules for the construction and installation of lifts – Lifts for the transport of persons and goods – Part 22: Electric lifts with inclined path
3.	EN 81-28 Safety rules for the construction and installation of lifts – Lifts for the transport of persons and goods – Part 28: Remote alarm on passenger and goods passenger lifts
4.	EN 81-58 Safety rules for the construction and installation of lifts – Examination and tests – Part 58: Landing doors fire resistance test
5.	EN 81-70 Safety rules for the construction and installations of lifts – Particular applications for passenger and goods passenger lifts – Part 70: Accessibility to lifts for persons including persons with disability
6.	EN 81-71 Safety rules for the construction and installation of lifts – Particular applications to passenger lifts and goods passenger lifts – Part 71: Vandal resistant lifts
7.	EN 81-72 Safety rules for the construction and installation of lifts – Particular applications for passenger and goods passenger lifts – Part 72: Firefighters lifts
8.	EN 81-73 Safety rules for the construction and installation of lifts – Particular applications for passenger and goods passenger lifts – Part 73: Behaviour of lifts in the event of fire
9.	EN 81-77 Safety rules for the construction and installations of lifts – Particular applications for passenger and goods passenger lifts – Part 77: Lifts subject to seismic conditions

10.	EN ISO 8100-1 Safety rules for the construction and installation of lifts – Lifts for the transport of persons and goods – Part 1: Passenger and goods passenger lifts
11.	EN ISO 8100-2 Safety rules for the construction and installation of lifts – Evaluations – Part 2: Examinations, calculations and tests of lift components
12.	EN ISO 8102-2 Electrical requirements for lifts, escalators and moving walks — Part 2: Electromagnetic compatibility with regard to immunity
13.	EN 13015 Maintenance for lifts and escalators – Rules for maintenance instructions

Table 2. List of draft standards to be completed and deadline for their availability

Reference information	
1.	EN 81-76 Safety rules for the construction and installation of lifts — Particular applications for passengers and goods passenger lifts — Part 76: Evacuation of disabled persons using lifts

Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.